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IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO  HOBART CORPORATION, et al., )  Plaintiffs, )  -vs- ) Case No. 3:10-CV-195 )  WASTE MANAGEMENT OF OHIO, ) INC., et al., )  Defendants. )  DEPOSITION OF CLARENCE WALL taken by me, Susan L. Bickert, a Certified Shorthand Reporter and Notary Public in and for the State of Ohio, at large, as upon Cross Examination, at the offices of Thompson Hine, LLP, Austin Landing I, 10050 Innovation Drive, Suite 400, Dayton, Ohio 45342, on Tuesday, January 17, 2012, commencing at 1:40 o'clock p.m. on behalf of the Plaintiffs.	1 ON BEHALF OF DEFENDANT VALLEY ASPHALT CORPORATION:  2 MARTIN H. LEWIS, Esq. (Via Telephone) Tucker Ellis & West LLP 1150 Huntington Building 925 Euclid Avenue Cleveland, Ohio 44115 ON BEHALF OF DEFENDANT WASTE MANAGEMENT OF OHIO, INC.:  7 WILLIAM H. HARBECK, Esq. (Via Telephone) Quarles & Brady LLP 411 East Wisconsin Avenue, Suite 2040 Milwaukee, Wisconsin 53202 ON BEHALF OF CARGILL, INC.:  11 MARK D. ERZEN, Esq. (Via Telephone) Mark D. Erzen, P.C. 13 321 North Clark Street, Fifth Floor Chicago, Illinois 60654-4769  ALSO PRESENT:  Scott Arentsen, DP&L
Page 2  APPEARANCES: ON BEHALF OF THE PLAINTIFFS: LESLIE G. WOLFE, Esq. Walter & Haverfield LLP The Tower at Erieview 1301 East Ninth Street, Suite 3500 Cleveland, Ohio 44114 ON BEHALF OF PLAINTIFF NCR: J. WRAY BLATTINER, Esq. Thompson Hine, LLP Austin Landing I 10050 Innovation Drive, Suite 400 Dayton, Ohio 45342-4934 ON BEHALF OF DEFENDANT DAYTON POWER & LIGHT COMPANY:  DREW H. CAMPBELL, Esq. FRANK L. MERRILL, Esq. Bricker & Eckler ON BEHALF OF DEFENDANT BRIDGESTONE AMERICAN TIRE OPERATIONS, LLC: DAVID T. MOSS, Esq. Hamna Campbell & Powell 3737 Embassy Parkway Akron, Ohio 44333  ON BEHALF OF DEFENDANT PHARMACIA CORP., fk/a MONSANTO COMPANY, fk/a MONSANTO RESEARCH COMPANY:  VICKI J. WRIGHT, Esq. (Via Telephone) Krieg DeVault One Indiana Square, Suite 2800 Indianapolis, Indiana 46204-2079	Page 4  1

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1	INDEX TO EXHIBITS	1	A Yeah.
2	Wall	2	Q Well, generally it involves a
	Depo. Ex. Description Page	3	A Right.
3	1 1000 1111 0	4	Q a landfill.
	1 1962 aerial photo of area including 22	5	A Across from the building.
4	South Dayton Dump	6	Q Right. Now, the process that we're
5 6		7	going to go through is I'm going to ask questions,
7		8	and then you're going to answer the questions, and
8		9	the court reporter is going to take all of that
9		10	down. So in order to make her job easier, I'd like
10		11	to ask you to agree with me that we won't speak
11		12	over one other. Okay?
12		13	A Okay.
13		14	Q So I will ask my question, and then
14		15	I'd like you to wait until I'm completely done
15		16	asking my question, and then I will wait while you
16		17	give your answer. All right?
17 18		18	A Okay.
19		19	Q Please try to make sure all of your
20		20	answers are verbal instead of shaking your head or,
21		21	you know, nodding. She can't take that down. All
22		22	right?
23		23	A Yes.
24		24	Q If you don't understand a question,
25		25	please let me know and I can ask it in another way.
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1	CLARENCE WALL,	1	Or if you don't know the answer, that's fine, too.
2	a witness being of lawful age, having been duly	2	Just say you don't know. But if you do answer a
3	cautioned and sworn, did testify upon his oath as	3	question, I'm going to assume you understood what I
4	follows:	4	was asking before. Okay?
5	CROSS EXAMINATION	5	A Yes.
6	BY MS. WOLFE:	6	Q And if you need a break for any
7	Q Please state your name and spell	7	reason, please just let me know.
8	your last name for the record, please.	8 9	A Okay.
9	A The whole name? O The whole name.	10	Q Mr. Wall, what is your current
11	Q The whole name. A Clarence Eugene Wall, W-A-L-L.	11	address? A 394 Marshall Drive. That's in
12	Q Good afternoon, Mr. Wall. My name	12	Xenia, X-E-N-I-A, Ohio 45385.
13	is Leslie Wolfe, and I represent the Plaintiffs in	13	Q And your date of birth?
14	this case, and we're here to take your deposition	14	A November the 7th of 1934.
15	today.	15	Q Have you ever had your deposition
16	Did you receive a Subpoena to be here	16	taken?
17	today?	17	A Not that I remember.
18	A Yes.	18	Q Okay. Now, as you know, we're here
	Q Okay. Have you ever been deposed	19	to talk about the time when you were working for
19		20	Dayton Power and Light Company, which I'm going to
19 20	before?		
19 20 21	before? A No.	21	refer to as DP&L. Okay?
19 20 21 22	before?  A No.  Q Are you familiar with what this case	21 22	refer to as DP&L. Okay?  A Mm-hmm. Fine.
19 20 21 22 23	before?  A No.  Q Are you familiar with what this case is about?	21 22 23	refer to as DP&L. Okay?  A Mm-hmm. Fine. Q First, tell me are you retired now?
19 20 21 22	before?  A No.  Q Are you familiar with what this case	21 22	refer to as DP&L. Okay?  A Mm-hmm. Fine.

	1		
	Page 9		Page 11
1	A In 2002.	1	A Well, that's where I reported. They
2	Q Before that where did you work?	2	had a place uptown for the office personnel.
3	Before you retired where did you work?	3	Q Are you familiar with the Dayton
4	A You mean before I started work at	4	Service Building on Dryden Road?
5	DP&L?	5	A On Broadway?
6	Q No, I just wanted to establish	6	Q Broadway.
7	whether you were working at DP&L up until the time	7	A Yes.
8	you retired.	8	Q It's now called Dryden, but it used
9	A Yeah.	9	to be Broadway; right?
10	Q Well, when did you start working at	10	A Okay. Back when I was there it was
11	DP&L?	11	Broadway.
12	A Forty-eight years, so it would make	12	Q Are you familiar with that building?
13	it about 1956, I think. In April.	13	A Yes, I am.
14	Q So you were hired on in 1956, and	14	Q So my understanding is that was
15	you worked there until 2002; correct?	15	built in about '55. Does that sound do you have
16	A Mm-hmm.	16	any idea if that's true?
17	Q What location were you at when you	17	A I don't know when it was built.
18	worked for DP&L?	18	Q Okay. So you started on Sycamore
19	A I hired on in Xenia. I worked there	19	Street. And was that called the Xenia Service
20	nine years. Then I transferred into the Line	20	Center?
21	Department. And I had trouble climbing, so we had	21	A Yeah.
22	to go through the union 'cause they was gonna make	22	Q Then you said did they close that
23	me quit the Line Department. And then they sent me	23	building at some time and move it, move to another
24	to Dayton, and I had to start over there with the	24	location?
25	Dayton Line Department. Dick Stump hired me over	25	A We moved to a new location, and they
	Page 10		Page 12
1	there.	1	sold either sold it or I think they probably
2	Q So you started in Xenia. Was that	2	sold it 'cause they had a little substation down
3	at a Service Center in Xenia?	3	there, too. It's still there, but I don't think it
4	A Yeah. It was down on Sycamore	4	feeds anything.
5	Street, and then they moved from there out to Hoop	5	Q When they moved to the Hoop Road
6	Road.	6	location, did all the same departments move along
7	Q To where?	7	with the Service Center?
8	A Hoop, H-O-O-P, Road. That's where	8	A Plus the people uptown. They closed
9	our Service Center is now.	9	the uptown office and moved it out there, too.
10	Q So for a part of that time you were	10	Q What street was that uptown office
11	based out of the Syracuse Street location and then	11	on?
12	part of that time you were	12	A South Detroit.
13	A Sycamore.	13	Q So they closed the South Detroit
14	Q Or I'm sorry. Sycamore. What did I	14	location and the Sycamore Street location and
15	say? Sycamore.	15	consolidated both of those at Hoop Road?
16	A That's where they used to have their	16	A Right.
17	headquarters and everything. Then they transferred	17	Q For the nine years that you were in
18	or bought that ground out there and built a new	18	Xenia, how much of that time was on Sycamore Street
19	building.	19	and how much was on Hoop Road?
20	Q What was the Sycamore Street	20	A Let's see. They built the place
21	location headquarters of?	21	I would say about three years on Sycamore.
22	A It had Line Department and Gas,	22	Q And then the remaining period was on
23	Meter Reading.	23	Hoop Road, so that would
24	Q When you say it was headquarters,	24	A Mm-hmm.
25	though, what do you mean by that?	25	Q make six years?
۷_	mough, what up you mean by mat:		~ make six years:

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1	_	1	
1 2	A Yeah. They're still operating out of that building.	1 2	Dayton Service Building, do you know what year that was?
3	Q Are both of those in Xenia?	3	A No, I don't.
4	A What's that?	4	Q Would you say it was around
5	Q Both of those locations in Xenia?	5	A I'd say it was about nine years and
6	A No.	6	six months from after I hired in.
7	Q What city is Hoop Road?	7	Q So would that be very late 1965?
8	A One's two and a-half miles out of	8	A I'd say '65, something like that
9	town, and the other one's right off of Third	9	best I can remember, '64 or '5.
10	Street.	10	Q '64 or '65?
11	Q What do they call the Hoop Road	11	A Yeah.
12	facility?	12	Q And how long did you work out of the
13	A Xenia Service Center, I guess.	13	Dayton Service Building?
14	Q They still call it Xenia Service	14	A Probably 15 years. Maybe longer.
15	Center?	15	Q You said at one point you had
16	A Yeah.	16	trouble climbing?
17	Q But it's not really in Xenia?	17	A Yeah.
18	A No.	18	Q Was that at the end of that 15-year
19	Q And you were what department of	19	period?
20	DP&L were you in when you were in Xenia?	20	A No, no. That was probably a year
21	A Gas Department. That's where I	21	and a-half or two years after I was a lineman.
22	hired in at.	22	Q And what did that what did that
23	Q And then you said at some point you	23	mean for you?
24	transferred to the Line Department; correct?	24	A My knees wouldn't my knees just
25	A Mm-hmm, yes.	25	was weak and they wouldn't stand me being on hooks
	Page 14		Page 16
1	Q And when you transferred to the Line	1	all the time or a pole.
2	Department, were you still at Hoop Road?	2	Q So that meant you no longer had to
3	A Yeah.	3	climb the poles?
4	Q How long did you work at Hoop Road	4	A Yeah. That's right.
5	in the Line Department?	5	Q Did you stay in the Line Department?
6	A Probably maybe six months.	6	A Yeah.
7	Q And after that you transferred to	7	Q And how did your job change?
8	the Dayton Service Building on Broadway?	8	A I went to equipment operator. It
9	A Yes.	9	was a special purpose equipment operator.
10	Q And you were still in the Line	10	Q So did you remain a special purpose
11	Department; correct?	11	equipment operator for the remaining time of that
12	A Yes.	12	15-year period?
13 14	Q Why did you transfer from Hoop Road	13 14	A Yes.
15	to Broadway?  A Because Broadway had an apprentice	14	Q What did a special equipment operator do?
16	program where Hoop Road did not.	16	A We run my job was running a
17	Q For that six months when you were at	17	puller to pull in lines. And we'd go out and put
18	Hoop Road as part of the Line Department, what was	18	rope in put rope in first. And then they'd set
19	your job title? Were you an apprentice then?	19	a machine up at one end, hook the wire on the
20	A Apprentice lineman.	20	machine, and I'd be down at the other end pulling
21	Q You were an apprentice lineman?	21	it in with this big reel.
22	A Yeah. You hire in as an apprentice,	22	Q So are you saying that you worked on
23	and then you go second, first and then trouble man	23	a crew that actually put the lines up
24	and a leader.	24	A Yeah.
25	Q So when you transferred to the	25	Q between the poles?

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1	A Mm-hmm. From one pole to the other.	1	time?
2	Q And you used ropes to do that?	2	A Yes, I did.
3	A Yeah, for about a three-mile area.	3	Q In what job?
4	Q So at one point you left the Dayton	4	A Equipment or, yeah, special
5	Service Building and you were transferred	5	purpose equipment operator.
6	elsewhere; right?	6	Q Was that the six-year period we just
7	A Yeah. I left Dayton and went to	7	talked about or the earlier period?
8	back to Xenia.	8	A Yeah, that was the time that I was
9	Q Okay. When was that?	9	in Xenia or Dayton.
10	A I don't know. Probably	10	Q Okay.
11	Q Was it around 1980?	11	A See, I can't remember what year they
12	A Probably in the eighties. I'd say	12	moved out to Woodman. I know this first move I
13	early eighties.	13	think was Salem was the first center they opened
14	Q Early eighties. It was after that	14	up, and then I think they opened Englewood.
15	15-year period we talked about?	15	Q So, Mr. Wall, are you saying that
16	A Yeah.	16	there was a portion of the time during that 15-year
17	Q So after spending about a 15-year	17	period from about 1965 to 1980 when you were a
18	period in the Line Department being based in the	18	special purpose equipment operator in Woodman?
19	Service Building on Broadway, you then were	19	A Mm-hmm.
20	transferred back to Xenia; correct?	20	Q How much of that time period was in
21	A Yeah. I asked for the transfer.	21	Woodman?
22	Q You asked for it?	22	A Probably maybe five years.
23	A Yeah. There was an opening, and I	23	Q And the part that wasn't in Woodman
24	took it.	24	was a time when you were based in the Service
25	Q What was the opening for?	25	Building?
	Page 18		Page 20
1	A Equipment operator.	1	A Right.
2	Q Was it similar to the job you were	2	Q You moved around a lot.
3	already doing?	3	A Not as much as some of 'em.
4	A No. It was running backhoes and	4	Q It sounds like it, though. Okay. I
5	stuff, which, you know, I knew how to do that	5	think I got it straight.
6	anyway.	6	A Oh, there is one correction.
7	Q And then how long did you stay in	7	Q What's that?
8	that position?	8	A When I was at Xenia before I retired
9	A Till I retired.	9	it wasn't so much a Line Department as it was the
10	Q So about 1980 until 2002?	10	Underground Department.
11	A Well, wait a minute. I take that	11	Q Okay. So does that mean that
12	back. I did go into the Gas Department for	12	A 'Cause it was the same electric
13	probably six years.	13	lines, but they were underground. Got you
14	Q So during that period 1980 to 2002,	14	confused?
15	you spent about six years in the Gas Department?	15	Q You got me confused. Let me ask if
16	A Yeah, running equipment.	16	this is correct.
17	Q So when you retired, what was the	17	A Okay.
18	last job you had before you retired?	18	Q The first time you worked in the
19	A Equipment operator.	19	Line Department was that when you were on Hoop Road
20	Q That was back to being an equipment	20	and you had that six-month period in about 1964 or
21	operator?	21	so?
22	A Mm-hmm.	22	A Yeah.
23	Q And was that based in Xenia?	23	Q You worked for six months in the
24	A Yes.	24	Line Department on Hoop Road?
25	Q Did you work out of Woodman at one	25	A Yeah. Then I come to Dayton.

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1	O And then you some to Devten?	1	There's the building
2	Q And then you came to Dayton? A Mm-hmm.	1 2	There's the building.  Q So this photo depicts generally the
3	Q So the period of time when you were	3	intersection of Dryden and East River Road and the
4	working for the Line Department was roughly 1964 or	4	river.
5	1965 until you retired, except for there was a	5	A Mm-hmm.
6	period of time that you were in Underground and	6	Q Are you
7	Gas?	7	A Yeah.
8	A Right. Because they in the	8	Q Does that look familiar to you?
9	district Underground and Gas, you know, was	9	A I think so.
10	basically the same. I mean, we dug a ditch two	10	Q Well, I wanted to ask you some
11	foot wide, put wire on this side and a gas main on	11	questions about the different buildings that were
12	this side. So	12	on the property where the Service Building was.
13	Q Those were not within the Line	13	A Mm-hmm.
14	Department; correct?	14	Q Can you recognize on that map where
15	A Huh? Well, it was all line or gas,	15	the Service Building was?
16	I mean, you know. I don't know how the company	16	A Not for sure.
17	separated costwise, but we went out and done the	17	Q Okay. All right. We don't have to
18	same job. We'd dig the ditch and then put the wire	18	do that then if it's difficult to familiarize
19	on one side and the gas main on the other side.	19	yourself with it.
20	Q Okay.	20	Well, putting the map aside then for a
21	A Put the transformers and pedestals	21	minute, do you remember the buildings that were
22	in.	22	A Yeah.
23	Q Okay. I'm going to ask you some	23	Q located on the property where the
24	questions about each of these different jobs that	24	Service Building was?
25	you did. All right?	25	A Most of 'em.
	Page 22		Page 24
1	A Okay.	1	Q Can you describe them to me?
2	(WHEREUPON, Wall Deposition	2	A There was the main building, Service
3	Exhibit Number 1 was marked	3	Building, and then out behind it was an oil
4	for purposes of	4	building where they took oil out of transformers
5	identification.)	5	and cleaned it, put it back. And then there was a
6	Q Showing you what the court reporter	6	garage down at the other end of the lot, and then
7	has marked for identification as Exhibit 1. This	7	they had a building for the storeroom that worked
8	is an aerial photo from 1962. And if you would	8	outside. There was a building for it. And then
9	just take a look at that and tell me if you	9	there was a building at the gates where you drive
10	generally recognize the area where the DP&L Service	10	in off of Broadway for the guard to be in.
11	Building on Broadway was? Do you recognize it on	11	Q Was that guard building on the south
12	there?	12	end or north end of the property?
13	A It seems like it's right here.	13	A It was you come across the
14	Q Well, it's actually just adjacent or	14	bridge, turn left into the lot.
15	near the river. Do you see the river running	15	Q So that was near the river?
16	through that photograph?	16	A Right.
17	A That's the river?	17	Q Was that the north end of the
18	Q Yes.	18	property?
19	A Okay. Then the building should have	19	A Yeah, I'd say so.
20	been on this side.	20	Q Was that an employee parking lot or
21	Q The top of the page is north.	21	a
22	A North. This is 75? Is 75 on here?	22	A Well
23	Q 75 is on there. It runs from the	23	Q truck lot?
24	top of the page down to the bottom of the page.	24	A You had to pull in there, and then
25	A Okay. This must be 75. Okay.	25	you went to the employee parking lot or you could

		1	
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1	turn right and go down to the garage, and you could	1	A Mm-hmm.
2	circle around the building and come back out in the	2	Q There was a pool table?
3	parking lot again.	3	A Yeah, had a pool table, had card
4	Q When you worked there is that where	4	tables in there.
5	you pulled in in the mornings?	5	Q Did you sometimes spend the whole
6	A Yep.	6	day down there?
7	Q Did you work the day shift?	7	A Yeah, sometimes maybe a week.
8	A Yep.	8	Depends on how cold it was. If it was cold the
9	Q Did you always work the day shift?	9	whole week, we'd spend the whole week down there if
10	A Unless I was called in.	10	we didn't have to go out on a call.
11	Q Did you ever work a regular night	11	Q If the weather was bad for a long
12	shift?	12 13	time and they knew it was going to be bad, did you
13 14	A No.	14	still have to come to work?  A Yeah.
15	Q Did your shift remain the same the	15	
16	whole time you were out there?  A Yeah.	16	Q They never just said "stay home"? A No.
17	Q What time did your shift begin?	17	Q You mentioned there was an oil
18	A 7:30.	18	building behind the main Service Building?
19	Q And you would drive to work in your	19	A Mm-hmm.
20	car and park in the parking lot that you just	20	Q Was that
21	described?	21	A They called it the Oil House.
22	A Yep.	22	Q That was called the Oil House?
23	Q And what would be the first thing	23	A Yeah.
24	you would do when you got to work after parking	24	Q Did you ever work in the Oil House?
25	your car?	25	A No. That was electric
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1	A Go in the building usually.	1	constructions.
2	Q Did you have to check in or sign in	2	Q Pardon?
3	somewhere?	3	A Electric substation electricians,
4	A The only time I had to sign in was	4	put it that way.
5 6	if I worked overtime.	5 6	Q What did the substation electricians
7	Q And how did you find out where you	7	do? I don't understand what you're saying.
8	were going to be going for the day on any given day?	8	A Well, they had these big transformers in substations, and they would have to
9	A I'd go in to work. Then I'd go out	9	drain oil out of 'em and put new oil in 'em. Then
10	on the dock, and my foreman would pick up the	10	they'd take the old oil over and run it through
11	orders, come out on the dock and tell us what we	11	this building through the refinery thing in it, and
12	was going to do, and then we'd get the material and	12	then like new oil they could take it back out and
13	go do it.	13	reuse it.
14	Q Did you always go right out at the	14	Q In your time working in the Line
15	beginning of the day?	15	Department and based at the Dayton Service
16	A Well, unless it was raining. We had	16	Building, did you become familiar with a lot of the
17	an inclement weather clause for 10 you know, if	17	operations that took place there?
18	it was raining or and if it was I forget what	18	A Not familiar enough to do 'em. I
19	the temperature was, zero or 10 above, something	19	just knew what they did in 'em, you know.
20	like that, we didn't have to work.	20	Q Did you walk around the building and
21	Q And if you had inclement weather	21	see what other people were doing?
22	like rain or cold temperatures, what did you do	22	A Yeah.
23	then?	23	Q Did you go into the Oil House?
24	A Went down and played pool.	24	A I never went in there when they was
25	Q In the building?	25	doing it, no.

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1	Q You mentioned there was a garage at	1	A That was just a place for the
2	the end of the lot; correct?	2	they used to have DP&L when you got, I don't
3	A Right.	3	know, so old or something, you know, they would put
4	Q Was that at the south end by East	4	you out there as a guard and you'd just check the
5	River Road?	5	cars in and out.
6	A That's where they done the body work	6	Q Did you ever do that job?
7	and overhaul the equipment or if it broke down	7	À No.
8	where they took it to have it fixed.	8	Q You're not old enough yet?
9	Q Did you ever work in that building?	9	A I wasn't old enough then. By the
10	A No.	10	time I got old enough, they did away with it. They
11	Q You mentioned there was a building	11	got a security system now. The guys ride around in
12		12	a car.
13	A I was in it, but, I mean, I was	13	Q When you would go out on a job,
14	never a mechanic or body man or anything.	14	would you leave from the Service Building through
15	Q You've been inside that garage?	15	that gate at the near East River Road or up top
16	A Oh, yeah, a lot of times.	16	by where you came in in the morning?
17	Q When would you go inside there?	17	A Usually East River Road.
18	A If I had a truck and a headlight was	18	Q And then would you return back with
19	out or something I'd take it in there and have 'em	19	your service vehicle through East River Road?
20	fix it before I'd take it out or if it didn't run	20	A East River Road usually.
21	right.	21	Q Just let me finish asking my
22	Q You mentioned there was a building	22	question first before you start your answer just to
23	for the storeroom; is that correct?	23	make it easier for the court reporter. Okay?
24	A Yep.	24	A Okay.
25	Q Was that attached to the main	25	Q Now, for the time period that you
	Page 30		Page 32
1	Service Building?	1	worked in the Line Department before you were
2	A Yeah.	2	switched to the special purpose equipment operator
3	Q Now, was the storeroom the part that	3	position, during the time period before your knees
4	sort of ran alongside Broadway on the west side of	4	got real bad what kind of jobs were you doing?
5	the building?	5	A When I first went over to the Line
6	A Yeah, and it had big garage doors	6	Department I worked with George Lewis, and he
7	that opened up on it.	7	his crew set poles by hand and done mostly back
8	Q And was that where the line crew	8	yard work. If they had a bad pole or a transformer
9	A Well, we backed the trucks into the	9	in the back at night or something, they'd leave it
10	dock, and then on the other side of the dock would	10	and then we'd come out the next day and go pick it
11	be the doors you open up. And they usually kept	11	up.
12	'em open, though, and then they would that's	12	Q What was George Lewis's position?
13	where we'd get our material.	13	A He was a leader.
14	Q Did you ever work in the storeroom?	14	Q Is that same thing as a foreman?
15	A Not Dayton.	15	A Back then they called 'em working
16	Q Somewhere else then?	16	foremens.
17	A No. Hmm-mm.	17	Q Were there different levels of
18	Q So you would back up the truck and	18	foremen?
19	open the doors, and materials could be loaded into	19	A I don't think so. Not that I know
20	the truck from the storeroom?	20	of.
21	A Right, mm-hmm.	21	Q Did each crew have a foreman?
22	Q Was that a daily practice?	22	A Yeah.
23	A Yeah.	23	Q And then was there an individual
24	Q And then you mentioned there was	24	that was in charge of several crews?
25	another building at the gate; correct?	25	A Later. When I come to Dayton there

	Dama 22		Dama 25
	Page 33		Page 35
1	was, yeah.	1	A Well, there's a hole in the crossarm
2	Q So this period of time when you talk	2	in the center of it, and there's two holes in the
3	about George Lewis, was that before or after you	3	pole at the top, and you shove it through there and
4	came to Dayton?	4	tighten it up.
5	A When I did the first job I had	5	Q Did you deal with any electrical
6	when I come to Dayton I worked with him.	6	equipment as an apprentice?
7	Q Was he in charge of one crew or more	7	A What do you mean?
8	than one crew?	8	Q The actual wires or transformers
9	A Just one crew.	9	A Yeah.
10	Q And you worked with him and you	10	Q or capacitors or anything else up
11	worked on a crew that set poles by hand?	11	there?
12	A Mm-hmm. Dug holes by hand.	12	A Yeah.
13	Q Were those new poles or were they	13	Q What did you have to do with those?
14	replacement poles?	14	A Depends. Sometimes you have to make
15 16	A Oh, could be new or whatever. They	15	a service for a house or something, and then you'd
16 17	was usually no bigger than a 40 because they was ones back in the easements.	16 17	occasionally we'd have to go out and change taps on a transformer.
18		18	
19	Q And were you just a laborer then? A Yeah.	19	Q What does that mean? A Take the lid off the top of it
20	Q You weren't an apprentice?	20	first you pull the cutout to kill it, to kill the
21	A Well, I was apprentice, but that's	21	transformer, and then you take this lid off, and
22	what I'm telling you they had an apprentice	22	you reach your hand down in there. And there was
23	program, and that's where all apprentices started	23	A, B and C, and they would tell you which was on,
24	out with George Lewis. And they worked there, I	24	and then you'd know to turn it one way or the other
25	don't know, six weeks, six months, and then they	25	to put it on the other. Like a hundred percent
	Page 34		Page 36
1	went into the regular apprentice out on a grow	1	turn it to the right. And then you put the lid
1 2	went into the regular apprentice out on a crew.  Q Are you in touch with George Lewis?	1 2	turn it to the right. And then you put the lid back on and close the cutout, and it's a hundred
3	Q Are you in touch with George Lewis? A Huh?	3	percent then.
4	Q Are you in touch with George Lewis?	4	Q Is the cutout something that you
5	A He died a long time ago.	5	open?
6	Q He died. Okay. And then how long	6	A Mm-hmm. With a stick.
7	after you transferred to Dayton did you start	7	Q With a stick?
8	having trouble with your knees?	8	A It's got a fuse in it.
9	A Probably two years.	9	Q And that allows you to cut the
10	Q Do apprentices climb poles?	10	power?
11	À Yeah.	11	A Mm-hmm.
12	Q And what is the purpose of their	12	Q 'Cause you can't open the
13	climbing poles? Why do they climb poles?	13	transformer until you cut the power?
14	A Well, they had to frame 'em and get	14	A Right.
15	'em ready to put wires on 'em.	15	Q Was there a fluid inside those
16	Q What has to be done to get 'em ready	16	transformers?
17	for wires?	17	A Oil.
18	A Well, some of 'em have crossarms.	18	Q What did it look like?
19	You'd have three phases on a crossarm, so you'd	19	A A real light color brown.
20	have to put rollers on all them. Then you had your	20	Q Was it thin or thick?
21	secondary down below that, and then if you had a	21	A Thin.
22	transformer you had to put it between a primary and	22	Q As thin as water?
23 24	a secondary.	23 24	A Yeah, basically.
24 25	Q How do you affix a crossarm onto a pole?	25	Q Did it have any kind of smell? A Yeah.
	poic:		A I Vall.

	Page 37		Page 39
1	Q What did it smell like?	1	A Yeah.
2	A I don't know. Just had an oily	2	Q Was there ever a part like that that
3	smell to it.	3	was made out of porcelain instead?
4	Q Did all of the transformers contain	4	A That is porcelain.
5	a similar kind of oil like what you're describing?	5	Q That is porcelain?
6	A All I know of.	6	A Yeah.
7	O Were those ceramic or metal	7	Q Okay. So when you said glass, you
8	transformers?	8	meant porcelain?
9	A Metal.	9	A Yeah, porcelain. I'm sorry.
10	Q Did you ever see ceramic	10	Q No, thanks for clearing that up
11	transformers?	11	'cause I didn't know that that was one and the
12	A No.	12	same.
13	Q Were they all round the ones you	13	A Yeah.
14	saw?	14	Q How big were the transformers that
15	A Most I've seen was round, different	15	you dealt with as an apprentice?
16	size round ones, but most of 'em was round.	16	A They'd come different sizes from
17	Q Did they have any nameplates on them	17	probably a 15 kVA to a hundred kVA.
18	that said who made them?	18	Q Were those all pole-mounted
19	A GE made some. I don't know who else	19	transformers?
20	made 'em.	20	A Yeah.
21	Q Did you see GE nameplates on them?	21	Q Did you do any work on transformers
22	A General Motors (sic).	22	other than pole-mounted transformers?
23	Q Did you ever see Westinghouse	23	A Underground.
24	nameplates?	24	Q That was later?
25	A Yeah, Westinghouse made 'em.	25	A Yeah, later.
	Page 38		Page 40
1	Q How about Kuhlman?	1	Q So this initial two-year period
2	A I don't remember seeing them.	2	before you had the knee trouble you worked for
3	Kuhlman?	3	George Lewis and you did you set poles and did
4	Q (Nodding in the affirmative.)	4	mostly background work; is that correct?
5	A I don't remember that. They may	5	A Well, I worked for George Lewis
6	have.	6	probably no longer than six months.
7	Q Is there one called Kuehler?	7	Q Okay.
8	A Huh?	8	A And then I worked for Bill Weaver.
9	Q Do you remember a manufacturer	9	They called him Tiny Weaver, but I worked for him.
10	called Kuehler being on any of the transformers?	10	That's when I done the climbing.
11	A No.	11	Q Now, during that time period, that
12	Q Did the transformers have a glass	12	two-year time period, did you ever haul any
13	part or piece on top of them?	13	materials from a job site to the South Dayton Dump
14	A They had two of 'em. One on each	14	across from the Service Building?
15	side. One went to ground; one went to the primary.	15	A When I worked for George Lewis we
16	Q Can you describe those glass parts	16	did.
17	to me?	17	Q And you're familiar with the South
18	A They was about four inches around	18	Dayton Dump?
19	and about maybe four to five inches tall, and they	19	A Yeah.
20	had a rod that went up through the stuff and then	20	Q Did you call it that at the time?
21	you put your wire in on the top.	21	A I just called it the dump.
22	Q So it was like a tube-shaped piece?	22	Q Was there any other dump that you
23	A Mm-hmm.	23	referred to?
24	Q And it just encased the wires that	24	A Not that I not around there there
25	connected to the transformers?	25	wasn't.

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1	Q Did you ever hear that dump called	1	trailer on it.
2	by any other names?	2	Q Let me finish the question.
3	A Hmm-mm.	3	Before you went to the job you would
4	Q So when you worked for George Lewis	4	figure you were going to need a trailer, so you'd
5	you hauled materials	5	take one with you?
6	A Over there.	6	A Right.
7	Q from the job to the dump?	7	Q And those poles that you would put
8	A Well, we'd go out like after a storm	8	on the trailer, were they a full complete length of
9	or something and they'd have a broken pole or	9	pole or just part of a pole?
10	something. We'd put that on the trailer, and if	10	A We have taken full poles out, yeah.
11	there was a transformer there we'd throw it on the	11	Q Was the trailer long enough to carry
12	trailer, take it over and dump it over there at the	12	a full pole?
13	dump.	13	A Well, you had winches. We could
14	Q What kind of trailer are you	14	winch it down. But then we had to put a flag on
15	referring to?	15	the end of it 'cause it stuck out past the trailer.
16	A It's a pull-type trailer. Bed on it	16	Q Did you ever take full poles to the
17	was probably eight foot long and four, five foot	17	South Dayton Dump?
18	wide.	18	A No.
19	Q Was that different than a standard	19	Q Did you take partial poles?
20	Line Department service vehicle?	20	A Yeah.
21	A Well, it don't have no it's just	21	Q Did you take crossarms?
22	a trailer.	22	A Yeah.
23	Q Is that what you would always take	23	Q Now, when you were at a job site,
24	out to a job?	24	did you always take the leftover or the waste
25	A Yeah.	25	materials from the site to the South Dayton Dump or
	Page 42		Page 44
1	Q What kind of trucks did you drive or	1	did you sometimes take it elsewhere?
2	did your crew drive when you worked for George	2	A Most generally it went to the dump.
3	Lewis?	3	Q Who would decide whether it goes to
4	A Just a line truck with a crew cab on	4	the dump or not?
5	it.	5	A I guess George Lewis. I don't know.
6	Q Is that different than the trailer	6	He was the foreman. Him and the truck driver. He
7	you just mentioned?	7	had his own truck driver.
8	A Yeah. A trailer didn't have no	8	Q Do you recall somebody telling you,
9	motor or nothing on it. It just hooks on the back	9	"Take this material to the dump"?
10	of the truck.	10	A No, I never I never actually
11	Q So would a trailer be used when you	11	drove to the dump. Charles or I was in a crew
12	had a pole that needed to be taken away?	12	cab, and we'd go out to the dump, and then we'd
13	A Well, or anything you had to haul we	13	dump it off out there.
14	usually put it in a trailer 'cause the inside of	14	Q So you would be riding in the truck
15	the truck had a thing on it that you pulled back,	15	and somebody else would be
16	you know, and you're limited to space, and you've	16	A Riding in a truck, yes.
17	already got most of that stuff is just that you	17	Q And the driver would drive into the
18	carry out to take to go work on something.	18	dump?
19	Q So was there somebody that would	19	A Mm-hmm.
20	bring the trailer out to you at the job site?	20	Q So it wasn't your decision to go in
21	A No. We'd pull it out behind the	21	there?
22	truck.	22	A No.
23	Q So before you went to the job you	23	Q But you personally were in there?
24	would figure out	24	A Yes.
25	A Know whether we're gonna need the	25	Q And then on those occasions when you

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1	went into the dump, did you assist in unloading?	1	crossarms or whatever, they usually took 'em back
2	A Yes.	2	into the storeroom.
3	Q And did you what do you remember	3	Q 'Cause those were usable?
4	unloading at the dump?	4	A Yeah, everything was reusable.
5	A Broken poles, transformers. Small	5	Q When you worked for George Lewis,
6	ones, usually 15's. Occasionally a 25.	6	did you sometimes have did you ever have
7	Q Now, we're talking about the period	7 8	leftover dirt that had to go to the South Dayton
8 9	the two-year period before you had A That happened	9	Dump? A Yes.
10	Q before your knees started getting	10	A Yes. Q And you took it to the South Dayton
11	bad and you were changed to equipment operator;	11	Dump?
12	right?	12	A Yeah.
13	A That is the first six months.	13	Q How much dirt would there be on
14	Q This is in the first six months	14	average when you had dirt?
15	you're talking about?	15	A Probably a wheelbarrow full maybe.
16	A Right.	16	Q Did you have wheelbarrows with you
17	Q Okay. Now, after the first six	17	on these jobs?
18	months you worked for Bill Weaver	18	A Yeah.
19	A Bill Weaver.	19	Q Why would there be leftover dirt
20	Q Who you called Tiny?	20	that had to be gotten rid of?
21	A Yeah.	21	A 'Cause we couldn't tamp it down in
22	Q And did you work for him for the	22	there. You dig a hole, you set a pole, and the
23	rest of that period until your knees got bad?	23	circumference of that pole you can't get dirt all
24	A Yeah.	24	in around it.
25	Q And when you worked for Bill Weaver,	25	Q Were those jobs ever replacement
	Page 46		Page 48
1	did you continue to do the same kind of work as you	1	poles or were those all new poles?
2	did for George Lewis?	2	A With George Lewis we would set a new
3	A No.	3	pole to replace an old pole.
4	Q What was different?	4	Q Did those jobs involve transformers
5	A I climbed poles then.	5	that had blown up or blown out?
6	Q You didn't climb poles when you	6	A Normally the ones we set, no. We
7 8	worked for George Lewis?	7 8	set lift poles mostly where they'd come from a big
9	A No. We dug poles by hand, set poles by hand. Everything he done was by hand. Might go	9	house. The span would be too long, so you had to put a pole in here to span it over to a house.
10	out and fix somebody's flower bed or something.	10	During a storm or something that's when we'd get
11	Q When you worked for Bill Weaver	11	broken poles and where they'd cut 'em off so they
12	while you were still climbing poles, did you take	12	could set their new pole.
13	materials to the South Dayton Dump from those jobs?	13	Q So when you worked for George Lewis,
14	A No, I never did take any. After I	14	did you have jobs that involved storm-damaged poles
15	got with Weaver, I never went back over to the	15	and transformers?
16	South Dayton Dump.	16	A Yeah.
17	Q So it was just during the six months	17	Q During that period did you have jobs
18	with George Lewis?	18	that involved
19	A Yeah. 'Cause everything we got came	19	A We just went out and cleaned up
20	usually right out of the storeroom. He done mostly	20	after the line crew is what we done.
21	plats and stuff like that. Everything was new.	21	Q Okay. So did it also involve during
22	We'd set poles. That's when we'd frame poles.	22	that time period poles that had been hit by cars
23	Q So were there any waste or leftover	23	and gotten into wrecks?
24	materials from setting those new poles?	24 25	A Yeah.
25	A If there was a waste or extra	25	Q Did it involve transformers that had

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1	gotten wrecked?	1	out in a plat and set 'em, but we'd also set poles
2	A Yeah.	2	up between the primary on the lines. They would go
3	Q Did it involve transformers that had	3	the linemen would go up in a bucket truck and
4	gotten completely smashed to where they couldn't be	4	put the hoses and stuff on the lines. Then I'd dig
5	repaired?	5	the hole and they'd hook a pole onto it and set it
6	A Yeah. Usually when a transformer	6	up, set it in there.
7	falls it ain't you can't repair it usually	7	Q When you operated a digger, were you
8	'cause it busts the case on 'em, breaks the case,	8	part of a line crew or you just went around to
9	bends it.	9	different line crews and assisted them?
10	Q Can you estimate how many times	10	A Went to different line crews and
11	during that period you worked for George Lewis you	11	assisted them.
12	took any materials of any kind to the South Dayton	12	Q You weren't assigned to one crew?
13	Dump?	13	A No.
14	A Probably two or three times.	14	Q Did you get your orders in a similar
15	Q Only two or three times during that	15	way as you did before by coming into the Service
16	whole six-month period?	16	Building and getting orders from a foreman?
17	A That I can remember of. I might	17	A Well, I was on the dock and get
18	have went over more than that, but that's all I can	18	orders from the foreman.
19	remember.	19	Q Okay. So in the morning you'd go to
20		20	
	Q Was it even do you think it might		the dock, and was there one particular foreman that
21	have been even once a month or less than that?	21	was in charge of all the operators?
22	A Usually it was right after a storm	22	A There was a foreman that was over
23	or something is when we had to go over there a lot	23	two foremans over the diggers. One of 'em was Rule
24	that I went over there with him. I mean, the truck	24	Greitz, and the other one was Charlie McQuire.
25	driver would take it over if it was just dirt and	25	Q What was the first name?
	Page 50		Page 52
1	dump it by hisself 'cause all he had to do was hook	1	A Charlie McQuire.
2	a winch onto it, winch it up and let it down. He	2	Q What was the other name?
3	was ready to go. It was like a little dump truck.	3	A Rule Greitz.
4	Q Then we talked about how when your	4	Q Rule, R-I-L-E, or R-U-L-E?
5	knees got bad you went over you changed jobs	5	A R-U-L-E I think it was.
6	within the Line Department and you became a special	6	Q Last name with a G?
7	purpose equipment operator; right?	7	À Yeah.
8	A Mm-hmm.	8	Q Do you know if either of them are
9	Q And is it correct that that happened	9	still living?
10	probably in about 1966 or '67?	10	A They're both dead.
11	A Probably. Maybe '68. I don't	11	Q Yeah.
12	remember.	12	A Both deceased.
13	Q Describe your job as a special	13	Q So on a typical day when you were
14	purpose equipment operator.	14	operating the digger, how many jobs would you do?
15	A Well, we run I run a digger	15	A You counting each pole a job?
16	truck. There's two digger trucks, and I run that	16	Q Yeah.
17	pulling machine, and I think that was it.	17	A We could do 25 or 30 jobs a day.
18	Q When you ran the	18	Q How many times would you come back
19	A A dozer, too, bulldozer.	19	to the Service Building in the course of the day?
20	Q When you ran the digger truck, was	20	A Evening.
21	that digging holes for new poles?	21	Q So you would go out in the morning
22	A Yeah.	22	and be out all day and then come back at the end of
23	Q So were you working with line crews	23	your shift?
24	or as part of a line crew?	23	A Yeah.
25	A With a line crew. Sometimes we'd go	24 25	Q And during that time period, did you
	71 With a fine crew. Sometimes we d go	<u> </u>	And during that time period, did you

	Page 53		Page 55
1	ever go to the South Dayton Dump?	1	
1 2	A Not after I left George Lewis I	1 2	it over and dump it.  Q Did you see this happen?
3	- 1	3	A Huh?
4	Q So was the six months you worked for	4	Q Did you see this happen?
5	George Lewis the only time during your career with	5	A I didn't see 'em unloading it, but I
6	DP&L that you went to the South Dayton Dump?	6	knew they went in there.
7	A Yeah.	7	Q Was that from jobs that you were
8	Q Okay. When you worked for George	8	on-site
9	Lewis, did you have to fill out any paperwork?	9	A No.
10	A No.	10	Q as an equipment operator?
11	Q Did you ever see Mr. Lewis filling	11	A Hmm-mm.
12	out any paperwork?	12	Q So the people that you knew went in
13	A I'd see him filling it out, yeah.	13	there, were they coming from job sites?
14	Q Do you know what information he had	14	A Yeah, they was coming from a job
15	to report?	15	site where the transformer pole had been hit,
16	A He had to turn in a sheet with our	16	transformer fell down, and they was bringing the
17	names on it, how much time we spent on each job,	17	transformer in.
18	and then at the end of the week he totaled it up.	18	Q How do you know that they were doing
19	Q Now, is there a time when you went	19	that?
20	from being an apprentice to a second class lineman?	20	A You could see it on the back of the
21	A I transferred into special purpose	21	truck.
22	equipment operator at the time I would have went to	22	Q You would see the truck coming down
23	second class. That job came open, so I took it.	23	the road and turn into the dump?
24	Q So by doing that you were no longer	24	A Yeah, turn in there. And they'd
25	on the track to become a second class and then a	25	take it back, unload the transformer and leave it,
	Page 54		Page 56
1	first class lineman?	1	come back
2	A Right.	2	Q How often did they do that?
3	Q Were there different levels of	3	A Hmm?
4	equipment operator that you went through?	4	Q How many times would you see that
5	A Well, there was operators and then	5	happen?
6	there was only one special purpose equipment	6	A Oh, I don't know. I don't know how
7	operator.	7	many times I seen it.
8	Q That was you.	8	Q Could you see that the transformer
9	A Yeah.	9	was on the truck?
10	Q And there were other what were	10	A Yeah.
11	the other operators called?	11	Q Could you see anything else on the
12	A They were just operators. They run	12	truck?
13	backhoes or ditch witches and stuff in the Gas	13	A Oil.
14	Department.	14	Q You saw the oil?
15	Q Did you ever see any other DP&L	15	A Mm-hmm.
16	employees going into the South Dayton Dump to dump		Q Where were you when you saw this?
17	anything?	17	A Huh?
18	A Yeah, they went in there all the	18	Q Where were you standing when you saw
19	time.	19	this?
20	Q Who did?	20	A Well, I seen the truck when it would
21	A DP&L.	21	go in the dump, and then when they'd come over to
22	Q Which	22	the building I seen the oil on the back of it, so I
23	A Trucks. I mean, I don't know who	23	knew that it was a bad transformer.
24	they were, but if they had a bad transformer that	24	Q Did you see that on more than one
25	fell off of a pole or something they used to take	25	occasion?

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1	A Yeah. I don't know how many	1	supposed to be done?
2	occasions it was.	2	A Huh?
3	Q But you have a specific recollection	3	Q Was that something that you believed
4	of seeing a truck coming back with oil on it after	4	you were supposed to do?
5	it had come out of the dump?	5	A Yeah.
6	A Yeah.	6	Q And what would cause oil to spill on
7	Q Did those trucks come down to the	7	the ground during that time period? What kind of
8	East River Road gate and come in from the south end	8	situations would you come across where there would
9 10	that way?	9 10	be oil on the ground?
11	A Usually they come across the bridge and went in the ones that I seen.	11	A Where the wind would blow a pole down or something back in an easement.
12	Q You mean they'd come across the	12	Q Did you use anything to clean up the
13	bridge from the north and take a right into the	13	oil other than just scooping up the dirt?
14	dump?	14	A That's it.
15	A Right.	15	Q Was there ever spills of oil on
16	Q And then they would come out of the	16	pavement or roads?
17	dump at the same place?	17	A Yeah.
18	A Yeah, and come around and come into	18	Q And, again, we're talking about the
19	the usually drive down to the south gate and	19	period when you worked for George Lewis; correct?
20	come back in. We never it was hard to bring the	20	Is that what you're thinking of?
21	big trucks in that other gate up there. It was	21	A No, this was different.
22	okay to leave out that one, but the south gate was	22	Q What period of time are you thinking
23	a lot easier because you had more room.	23	of?
24	Q When you worked for George Lewis,	24	A Well, they was on Woodman Drive.
25	what other kinds of what kinds of materials did	25	Gillis was hauling transformers, and he didn't have
	Page 58		Page 60
1	you take to the South Dayton Dump besides what you	1	one tied down. And it fell out on Woodman Drive
2	mentioned before which were poles, crossarms and	2	and busted, and we had to clean that mess up.
3	transformers?	3	Q How did you clean it up?
4	A Dirt.	4	A Floor-Dry and then sweep it, put it
5	Q Did that dirt have transformer oil	5	in barrels, and then keep doing that till we got it
6	in it?	6	all up.
7	A Some of it.	7	Q And then what did you do with the
8	Q Was there anything else?	8	material in the barrels?
9	A No, we took good dirt and bad dirt.	9	A I think they sent that stuff to
10	It was all dirt.	10	Cincinnati.
11	Q Was that dirt you couldn't put back	11	Q That was in the 1970s?
12	in the hole?	12	A No, that was earlier than that or
13	A Yeah. Or if it sometimes you had	13 14	later I mean.
14 15	to dig around if there was an oil spill, you had	15	Q Was it in the 1980s?
15 16	to dig some of that up, and then we usually put other dirt down there.	15 16	A It was about the time I left and went to Xenia.
17		17	Q Do you need to take a break? We can
18	Q So was it DP&L's policy to remove any dirt that oil had spilled on during that time	18	at any time take a break.
19	period?	19	A That's okay. I'm all right.
20	MR. CAMPBELL: Objection, foundation.	20	Q Going back to the materials that you
21	THE WITNESS: It wasn't I don't know	21	took to the South Dayton Dump or that you saw taken
22	it was their policy or not. We just did it because	22	to the South Dayton Dump when you worked for George
23	didn't want the oil on the ground.	23	Lewis, were there any metal parts?
24	BY MS. WOLFE (Continuing):	24	A Yeah.
25	Q It was something that you knew was	25	Q What kind of metal parts?
	Z 20 11 000 DOMESTICE WIND JOSE KILLON 11 1100		/

	Page 61		Page 63
			_
1	A The insulators or bolts, braces.	1	like that.
2	Used to have metal braces on the poles back in them	2	Q Do you recall any other dumpsters
3	days.	3	around the building?
4	Q When you were on a truck that went	4	A Not till later.
5	into the dump, did everything from the truck get	5	Q What do you recall seeing later?
6	dumped?	6	A Well, later on they bought or
7	A Everything on the trailer got	7	they had these big ones that they'd slide off of
8	dumped.	8	the truck and set there.
9	Q Everything that was on the trailer	9	Q How many were there like that?
10	got dumped?	10	A Let's see. I only know of one
11	A Yeah.	11	there was one for the Line Department and storeroom
12	Q Was there any effort to distinguish	12	there. At the end of the storeroom was one.
13	something should go in the dump and some things	13	Q So did that replace the paper one
14	shouldn't go in the dump?	14	that you mentioned earlier?
15	A Not as far as we was concerned.	15	A No, that was the paper one was
16	Q Now, back at the Dayton Service	16	just a thing for people to throw paper in, you
17	Building, did you ever see any dumpster or waste	17	know.
18	container outside?	18	Q And then they added this larger
19	A Paper container.	19	container that slid off the truck?
20	Q There was a paper container?	20	A Yeah. When they put that in I don't
21	A (Nodding in the affirmative.)	21	think there was anybody that went to over across
22	Q What did that look like?	22	the street 'cause they throwed everything in there
23	A Just a thing that you put paper in.	23	or 90 percent of it.
24	Q How big was it?	24	Q So there was a time that you recall
25	A Probably maybe five foot by three or	25	that people stopped taking
	Page 62		Page 64
1	four foot. Set up on the dock.	1	A Yeah.
2	Q Was it the size of a typical	2	Q materials to the South Dayton
3	dumpster you'd see behind a building?	3	Dump?
4	A Small one, yeah, something like	4	A Mm-hmm. That I know of anyway.
5	that. Only it had wheels on it. I think the	5	Q Did you ever see anybody take
6	storeroom would take it inside, and I don't know	6	anything from the Dayton Service Building to the
7	what they done with it. Sent it to someplace, I	7	South Dayton Dump?
8	imagine.	8	A No. You mean out of the building?
9	Q Now, this was located where in	9	Q Or anything from that area. We
10	relation to the	10	talked about earlier the materials coming from a
11	A On Broadway.	11	job when you were working for George Lewis
12	Q On the west dock where the trucks	12	A Yeah.
13	would pull up?	13	Q to the dump.
14	A Right.	14	A Mm-hmm.
15	Q And did you ever see anyone put	15	Q Did you ever see anything coming
16	anything inside it?	16	from elsewhere to the dump?
17	A We used to throw cardboard in there.	17	A Yeah.
18	We'd get stuff out of the storeroom like	18	Q From where?
19	insulators. There's so many in a box and put them	19	A From the South Yard.
20	on the truck and throw the box in that thing.	20	Q Where was the South Yard?
21	Q Do you know if any other employees	21	A As you go out the bottom gate, it
22	other than the storeroom employees put anything in	22	was just down the street to the right.
23	the dumpster?	23	Q Was it on the same side of East
24	A Anybody that walked down through	24	River Road as the Service Building?
25	there throwed stuff in there, paper cups and things	25	A Opposite side.

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Page 65
                                                                                                           Page 67
 1
            O And that was a -- the South Yard was
                                                             1
                                                                  treated with creosote?
 2
                                                             2
      operated by DP&L?
                                                                        A Yeah, they was creosoted.
 3
                Mm-hmm.
                                                             3
            Α
                                                                            Did vou see somebody load up a truck
 4
            0
                And was it called the South Yard?
                                                             4
                                                                  or a trailer with those broken poles from the South
 5
                That's all I knew it by.
                                                             5
                                                                  Yard and drive it across the street to the South
            Α
                                                             6
 6
               What was it used for?
                                                                  Dayton Dump?
            O
                                                             7
 7
            A Oh, more or less -- let's see. They
                                                                        A What-you-ma-call-it used to do it
 8
      had two -- one or two buildings over there that
                                                             8
                                                                  all the time, pole hauler. I forget what his name
                                                             9
 9
      they kept stuff in for the Gas Department. And
                                                                  was. Whenever a rainy day and they'd get so many
10
      they would take like broken poles at night and
                                                           10
                                                                  poles over there they'd send him over to load them
      stack 'em over there, and then during the day
                                                           11
                                                                  up, him and his helper, and they'd load that truck
11
12
      they'd get 'em. And on a rainy day or where it
                                                           12
                                                                  up, take it over there and dump 'em.
13
      rains off and on they would go over and load them
                                                           13
                                                                        Q Did he work in the storeroom?
14
      on a bolt truck and take it over to the South Yard
                                                           14
                                                                        A No. He worked for the Line
15
                                                           15
      or over there at the dump and dump 'em.
                                                                  Department. The storeroom, I guess. I think he
16
                You're referring to the South Dayton
                                                           16
                                                                  worked out of the Line Department.
17
      Dump?
                                                           17
                                                                        Q Was he an operator?
18
                                                           18
                                                                        A No. He was a pole hauler.
            Α
                Yeah.
19
                                                           19
                Just to clarify, throughout the
            O
                                                                        O He was called a pole hauler?
20
      deposition when you've been referring to the
                                                           20
                                                                            Yeah.
                                                                        Α
21
      "dump," do you mean the South Dayton Dump?
                                                           21
                                                                            That was different from being an
                                                                        Q
22
            A Mm-hmm.
                                                           22
                                                                  operator?
23
                So other than the one or two
                                                           23
                                                                        A Right. There was a pole hauler, and
24
      buildings at the South Yard, what else was at the
                                                           24
                                                                  then there was a material hauler. Gillis was the
25
      South Yard? What else did you see there?
                                                           25
                                                                  material hauler.
                                                Page 66
                                                                                                           Page 68
 1
            A Later on they had poles set for an
                                                             1
                                                                        Q Did you see anybody else besides
 2
                                                             2
                                                                  that pole hauler take anything from the South Yard
      apprentice to climb on, and they used to use it for
                                                             3
 3
      like the garage had extra trucks. They would park
                                                                  to the South Dayton Dump?
 4
      them down there, and the substation they had a lot
                                                             4
                                                                        A No, I didn't see it, but I know they
 5
      of their stuff down there. Of course, it would be,
                                                             5
                                                                  did.
 6
                                                             6
      you know, a certain section for them.
                                                                        Q Did you ever see a truck parked
 7
                Was it used as a storage yard?
                                                             7
                                                                  around or near the Dayton Service Building that was
            0
 8
            A Yeah. That's about all it was.
                                                             8
                                                                  used like a dumpster?
            O You mentioned there was a pile of
                                                             9
 9
                                                                        A Do what?
10
                                                           10
      broken poles stacked in the South Yard?
                                                                        Q
                                                                            Did you ever see any truck at the
11
                                                           11
                                                                  Dayton Service Building that was used as a dumpster
            Α
                Yeah.
12
                Where did those broken poles come
                                                           12
            Q
                                                                  for waste material?
13
      from?
                                                           13
                                                                        A Not -- not a truck. I don't
                                                                  remember of it. They used to have them things
14
            A Jobs out at night where they had to
                                                           14
15
      pick 'em up. Pole truck would deliver a new pole,
                                                           15
                                                                  where another truck would hook onto it and pull it
16
                                                           16
      and then they would pick up the old pole and bring
                                                                  up on it. I think Franklin Iron and Metal
17
                                                           17
      it over there and dump it in the South Yard. And
                                                                  furnished them, and we'd throw metal in it. That
18
                                                           18
      then that way they kept the good poles on one --
                                                                  was later on just before I left.
19
      you know, so you wouldn't get too much there in the
                                                           19
                                                                        Q Do you know if the transformers that
20
                                                           20
      main yard.
                                                                  you saw taken to the South Dayton Dump when you
21
            Q Was there anything else that would
                                                           21
                                                                  worked in George Lewis's crew whether those
22
      be brought back by crews at night and put in the
                                                           22
                                                                  transformers had PCB oil in them?
      South Yard besides poles?
23
                                                           23
                                                                        A I guess all of 'em had BC (sic) oil
24
            A Not that I know of.
                                                           24
                                                                  in 'em.
25
            Q Do you know if those poles were
                                                           25
                                                                        MR. CAMPBELL: I'm sorry. Could you
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	Page 69		Page 71
1	repeat that answer again?	1	A About the same time.
2	THE WITNESS: That I know of. Huh?	2	Q But prior to that there was a time
3	MR. CAMPBELL: Could you read back the	3	period when there was nothing there was no
4	answer?	4	marking of the transformers
5	(Whereupon, the answer was read back by	5	A None.
6	the court reporter.)	6	Q as to whether they were PCB or
7	BY MS. WOLFE (Continuing):	7	non-PCB?
8	Q Do you mean PCB oil?	8	A Hmm-mm.
9	A Yeah, whatever it is.	9	Q Were you ever instructed to take any
10	Q Was there a time when Dayton Power	10	safety precautions to prevent yourself from coming
11	and Light had the Line Department employees test	11	in contact with PCB oil?
12	for PCBs in the oil?	12	A (Indicating in the negative.)
13	A (Indicating in the negative.)	13	Q That's a no?
14	Q Were you ever involved in any kind	14	A No.
15	of testing?	15	Q I realized that you were nodding
16	A No.	16	your head there.
17	Q Did you ever see that going on?	17	A We used to stick our arms in it to
18	A Hmm-mm.	18	change them taps.
19	Q Was there ever a time when you were	19	Q Did you wear gloves?
20	instructed to treat transformer oil differently	20	A No.
21	than you had previously?	21	Q Did you wash your hands afterwards?
22	A Yeah.	22	A In cold water and eating my lunch.
23	Q And what were you instructed to do?	23	Q To get the oil off?
24	A Well, we were instructed if there	24	A Yeah.
25	was any oil spills we was to clean 'em up or call	25	Q Because your hands would be greasy
•	Page 70		Page 72
1	EPA or whatever. Our foremens usually took care of	1	after they came out of that oil; right?
2	all that, though.	2	A Oily.
3	Q Do you know when that was?	3	Q Oily. Right. Did you ever have any
4	A What do you mean "when it was"?	4	problems with your skin as a result of coming in
5	Q Well, there was a time period when	5	contact with that oil?
6	something changed	6	A Nope.
7	A Yeah.	7	Q Did you ever know any other
8	Q as far as how you were instructed	8	employees who did?
9	to deal with transformer oil; right?	9	A (Indicating in the negative.)
10	A Mm-hmm.	10	Q Did you ever know any Line
11	Q And I'm asking when do you think	11	Department employees who had any kind of rashes?
12	that change occurred?	12	A Hmm-mm. Not over oil.
13	A Probably in early seventies.	13	Q Did you always work the day shift?
14	Q Did you ever see transformers marked	14	A Yeah.
15	or tagged as either having PCB oil or not having	15	Q Did you ever work the trouble truck?
16	PCB oil?	16	A No. Worked with the trouble truck,
17	A We used to have to put tags on 'em,	17	but I never worked the trouble truck.
18	I think, or the storeroom did, it had PCB in it.	18	Q What did you do when you worked with
19	Q Are you referring to new	19	the trouble truck?
20	transformers	20	A Just drove with him at night on
21	A Yeah.	21	callouts and stuff. If he'd go up and he'd need
22	Q that were going out?	22	something, he wouldn't have to come all the way
23	A Mm-hmm.	23	down. I could toss it to him or tie it on the
24	Q Do you know when that practice	24	line, and he'd pull it up.
25	began?	25	Q Was that during the time after you

	Page 73		Page 75
1	stopped climbing poles?	1	transformer shop decided whether to repair 'em or
2	A Yes.	2	not.
3	Q Was that during the time that you	3	Q Did you ever see any fly ash from
4	were a special equipment operator?	4	DP&L being taken to the South Dayton Dump?
5	A Mm-hmm.	5	A No.
6	Q So you would still have to work on	6	Q Did you ever see any bottom ash
7	the night crew from time to time?	7	being taken there?
8	A Yeah, they'd call us in, and since	8	A Hmm-mm.
9	you was there they'd keep you and have you go out	9	Q Did you ever see anything else other
10	with the line crew to assist them.	10	than the things you've already told me being taken
11	Q What kind of jobs did you do when	11	to the South Dayton Dump?
12	you were on the trouble truck?	12	A No.
13	A About any kind of trouble. I mean,	13	Q Did you talk to anyone the times you
14	whatever you drove up on. They'd give you an	14	went in the dump?
15	outage, and you'd drive up and maybe a hot tap	15	A I didn't, no.
16	burned open or a cutout open.	16	Q Do you remember seeing anyone
17	Q Was there ever any occasion when you	17	working there?
18	were with the trouble truck that a transformer had	18	A There used to be a guy standing out
19	to be replaced on a pole?	19	there, but I don't know he was probably the guy
20	A Yeah.	20	he worked there or owned it. I don't know. We
21	Q Did those jobs involve transformers	21	just drove by the building.
22	that were damaged beyond repair?	22	Q How far in did you go once you got
23	A No.	23	past the gate?
24	Q Did those jobs involve any	24	A We drove in, turned right, and then
25	transformer oil leaking or spilling?	25	turned left and usually dumped.
	Page 74		Page 76
1	A I don't remember. Probably leaking,	1	Q Did you see bulldozers working out
2	but I don't know.	2	there?
3	Q Did those jobs on the trouble truck	3	A Nope. Never paid no attention to
4	result in any materials that you took or saw being	4	'em.
5	taken over to the South Dayton Dump?	5	Q Do you have any memory of looking
6	A No.	6	around and seeing any what the materials were
7	Q If the trouble truck ever had any	7	that were in the debris that was already there?
8	materials they had to get rid of, what would they	8	A Oh, just usually there was just wood
9	do with them?	9	and stuff there. I mean, I didn't it was
10	A Take them back into the building.	10	usually close to quitting time. I was ready to
11	Q Into the Dayton Service Building?	11	dump and get out of there.
12	A There or Xenia Service Building,	12	MS. WOLFE: Well, I think that I'm done
13	whichever building they was working at.	13	asking questions for now, but some of the other
14	Q Would they be put in a storage yard	14	lawyers might have some questions for you, Mr.
15	or	15	Wall.
16	A Huh?	16	THE WITNESS: Thank you.
17	Q Were they put in some kind of a	17	MS. WOLFE: Does anyone on the phone have
18	yard?	18	any questions?
19	A Yeah, they had an area that they'd	19	MR. STRANG: Nope.
20	put bad transformers and they had an area for good	20	MR. ERZEN: Mark Erzen, no questions.
21	transformers.	21	MR. LEWIS: Marty Lewis, no questions.
22	Q Was the bad transformer area for	22	MR. HARBECK: Bill Harbeck, no questions.
23	ones that were going to be repaired or ones that	23	MS. WRIGHT: Vicki Wright, no questions.
24	were going to be trashed?	24	MR. CAMPBELL: Well, we have some. We'll
25	A The bad ones I think usually the	25	take a short break, then come back.

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1	(Whereupon, a recess was taken.)	1	Broadway.
2	CROSS EXAMINATION	2	Q And when did you start working on
3	BY MR. CAMPBELL:	3	Woodman Drive?
4	Q Good afternoon, Mr. Wall. How are	4	A I have no idea. I don't know what
5	you?	5	year.
6	A Just fine.	6	Q Let me ask you this. How long were
7	Q My name is Drew Campbell, and I	7	you with the Dayton Service Center? Do you
8	represent Dayton Power and Light. I'm going to ask	8	remember that? I mean at the Service Center on
9	you a few questions that are related to some of the	9	Broadway.
10	things you talked about earlier today and maybe	10	A Broadway? Probably ten years. I
11	some other things. Is that okay?	11	wouldn't swear to it.
12	A Okay.	12	Q So from about 1965 to about 1975?
13	Q First, I want to make sure I	13	A Yeah, and then I went to Broadway
14	understand exactly the years that you were working	14	or Woodman Drive, I think.
15	and where. I know we talked about that, and you	15	Q And how long were you at Woodman
16	were pretty specific, but my notes aren't as clear	16	Drive?
17	as they might be so I'm going to start with that.	17	A Couple years. Maybe three years
18	Okay. Now, you said that you started	18	there.
19	first working for DP&L in 1956; right?	19	Q So maybe 1978?
20	A Mm-hmm.	20	A Yeah.
21	Q And you were in Xenia at that time;	21	Q Plus or minus?
22	right?	22	A Something like that.
23	A Right.	23	Q Now, where did you go after that?
24	Q And we talked about Sycamore Street,	24	A To Xenia.
25	and then we talked about Hoop Road; right?	25	Q So back to Xenia. And then you
	Page 78		Page 80
1	A Mm-hmm.	1	stayed there till you retired?
2	Q And Hoop Road was the one a couple	2	A Till I retired.
3	miles outside of town?	3	Q So that's about 1978 to about 2002?
4	A About two and a-half miles, yeah.	4	A Mm-hmm.
5	Q And you were there for about nine	5	Q I just want to make sure I
6	years; right?	6	understand all of your positions. I want to go
7	A Yeah.	7	back over that real quick.
8	Q And then you went to the Service	8	Starting in 1956 when you first worked in
9	Center on South Broadway; right?	9	Xenia, what was your position there?
10	A Right.	10	A I was a laborer in the Gas
11	Q So that would have been about 1965?	11	Department, hired in.
12	A Whatever.	12	Q A laborer in the Gas Department?
13	Q And I'm just taking 1956 plus nine,	13	A Mm-hmm. A dollar fifty-six cents an
14 15	so I get to 1965. Do you agree with that?  A Yeah.	14 15	hour.
16	A Yeah. Q And you were there until you went	16	Q And how long did you do that?
17	back to Xenia; is that right?	17	A Let's see. How long was I a laborer?
18	A No. I was at I was there, and	18	
19	then they built a place on Woodman Drive or rented	19	Q How long you were a laborer, yeah. A Oh, probably six months to a year.
20	it and made a satellite out on Woodman Drive.	20	Then I went to pipeman.
21	Q Where is Woodman Drive?	21	Q Pipeman?
22	A It's in Dayton. It's right there	22	A Yeah.
23	just past Smithville, I don't know, towards Xenia.	23	Q And this is all in connection with
24	Q Towards Xenia?	24	working in the Gas Department?
25	A Yeah. That would be south of	25	A Yeah.
	11 1 Call, That would be south of		11 1 VIII,

1		Page 81		Page 83
the Gas Department?  A Probably four, five years. Let's see. Wait a minute. Yeah, about four years, and an equipment operator for about a year and a pipeman for about four years, that gets us to five years then?  A Right.  A Right.  O So if you were a laborer for about a year and a pipeman for about four years, that gets us to five years then?  A Right.  O So now were about 1961 or so. What did you do next?  A I think I become an equipment operator, and then I come to Dayton.  A I think I become an equipment operator denne?  A Yeah.  A Yeah. I transferred I didn't work there too long. Probably about a year. Then I went into the Line Department in Xenia, apprentice lineman, nine years after I hired in Q Sorry. Let me back up. You started out as a laborer				
A Probably four, five years. Let's  see. Wait at animute. Yeah, about four years,  A Yeah.  Q So both four years you think?  A Yeah.  Q So if you were a laborer for about a year and a pipeman for about four years, that gets us to five years then?  A Right.  Q So now we're about 1961 or so. What did you do next?  A I think I become an equipment operator, and then you weit to Dayton.  A I think I become an equipment operator, and then I come to Dayton.  Q So yo were an equipment operator for about six no labout a year. Then I work there too long, Probably about a year. Then I went into the Line Department in Xenia, apprentice lineman, ine years after I hired in. Q Sorry, Let me back up. You started out as a laborer  A Yeah.  Yeah.  Yeah.  Yeah.  A Yeah.  Yeah.  A Yeah.  Page 82  Then you were an equipment operator for about one year?  A Mm-hmm.  Page 84  A Mm-hmm.  Page 82  Then you were an equipment operator for about one year?  A Mm-hmm.  A Mm-hmm.  A Mm-hmm.  A Mm-hmm.  A Mm-hmm.  Q This is all in Xenia; right? A Yeah.  Q And what was your job title then? A Yeah. Q And what was still in Xenia; right? A Yeah. Q And what was still in Xenia? A Yeah. Q And what was still in Xenia? A Yeah. Q And what was your job there? A A Yeah. Q And what was still in Xenia? A Yeah. Q And what was your job there? A A Yeah. Q And what was your job there? A A Yeah. Q And what was your job there? A A Yeah. Q And what was your job there? A A Yeah. Q And what was your job there? A A Yeah. Q And what was your job there? A A Yeah. Q And what was your job there? A A Yeah. Q And what was your job there? A A Yeah. Q And what was your job there? A A Prenh. Q Apprentice lineman. A Prenh went to the Line Department. Q Apprentice lineman. Q So you were oun apprentice lineman? Q So you were oun apprentice lineman? Q So you were oun apprentice lineman? Q Yeah. Q And then you were in equipment operator for about one year? Q And then say the form the department operator for about one year? Q And what was your job there? A A Yeah. Q And what was			l .	
see. Wait a minuté. Yeah, about four years. 5			l .	
5 Q About four years you think? 6 A Yeah. 7 Q So if you were a laborer for about a year and a pipernan for about four years, that gets us for years then? 10 A Right. 11 Q So now we're about 1961 or so. What did you do next? 12 did you do next? 13 A I think I become an equipment operator, and then I come to Dayton. 14 operator, and then I come to Dayton. 15 Q So you were an equipment operator in the thine Department in Xenia. 16 then? 17 A Yeah. I transferredI didn't work there too long. Probably about a year. Then I went into the Line Department in Xenia. 19 I work there too long. Probably about a year. Then I went into the Line Department in Xenia. 20 apprentice lineman, nine years after I hired in. 21 Q Sorry. Let me back up. You started out as a laborer 22 A Yeah. 23 A Yeah. 24 Q for about six to 12 months? 25 A Yeah. 26 Q Then a pipeman for about four years. Then you were an equipment operator for about one year? 27 A Yeah. 28 Q Then a pipeman for about four years. Then you were an equipment operator for about one year? 39 Q And that was fili in Xenia; right? 40 Q This is all in Xenia; right? 51 Q And then after the equipment operator; then you became a lineman? 52 Q Then a pipeman for about four years. Then you were an equipment operator for about one year? 41 Q And then after the equipment operator for about one year? 42 A Yeah. 43 A Yeah. 44 A Yeah. 55 Q All in the Gas Department; right? 56 A Yeah. 77 Q All in the Gas Department; right? 78 A Yeah. 79 Q And that was still in Xenia? 79 Q And what was your job there? 70 A Yeah. 71 A Then I went to the Line Department. 71 Q And what was your job three? 72 A A paperntice lineman? 73 A Yeah. 74 Came to Papernice lineman? 75 Q And what was your job three? 76 A Papernice lineman? 77 A Yeah. 78 A Wash a big man? Is that why they called him Tiny? 99 Q And that was still in Xenia? 90 Q And what was your job there? 90 Yeah. 91 Q Yeah. 92 Q And what was your job three? 93 A A Deventice lineman? 94 A Papernitice lineman? 95 Q And then after the equipment oper			i .	
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24 A Yeah. 24 Q Bill, okay. And how long did you	l .		ě .	
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1 4 O KAY, BU IUSI SU I CAII IECAD, UICH 1 4 WOLK WHILDIN!	25	Q Okay. So just so I can recap, then	25	work with Bill?

	Page 85		Page 87
		_	
1	A Probably probably a year and	1	Q I'm going to add them, see how my
2	a-half.	2 3	math is here. I come up with 48 years. Does that
3 4	Q Still as an apprentice lineman? A Yeah.	4	sound about right? A Yeah. That's what I had in, 48
5	Q And after that what was your title?	5	*
6	Did it change?	6	years. Q Okay.
7	A Changed to special purpose equipment	7	MR. MOSS: Off the record.
8	operator.	8	(Whereupon, a discussion was held off the
9	O So this would have been about 1968	9	record.)
10	thereabouts?	10	MR. CAMPBELL: Back on.
11	A Yeah.	11	BY MR. CAMPBELL (Continuing):
12	Q And how long were you a special	12	Q So, Mr. Wall, for the 48 years that
13	purpose equipment operator?	13	you worked with DP&L, I think you said earlier that
14	A Till I went back to Xenia.	14	it was only that six-month time period when you
15	Q So that would be then to about 1975?	15	worked with Mr. Lewis that you brought materials
16	A Let's see.	16	and things like that to the South Dayton Dump?
17	Q Or '78?	17	A Mm-hmm.
18	A About '78 I'd say. 'Cause the	18	Q So for the other 47 and a-half years
19	tornado was in '74.	19	you didn't have any reason to be bringing things to
20	Q So you did this for about ten years?	20	the South Dayton Dump?
21	A Yeah.	21	A No. Right.
22	Q And then when you were an apprentice	22	Q And that would have been that
23 24	lineman that was in which department?	23 24	six-month period starting sometime in 1965; right?  A Mm-hmm.
25	A What department? Line Department.  Q Line Department. And when you were	25	A Mm-hmm. Q Now, I think you said I wrote
23		23	
	Page 86		Page 88
1	a special equipment operator	1	this down that during that six-month period you
2	A Line Department.	2	might have taken materials to the South Dayton Dump
3	Q Pardon me?	3	maybe two or three times?
4	A Line Department.	4	A Yeah.
5	Q Line Department? And then you	5	Q And that's two to three times that
6	returned to Xenia about 1978?	6 7	you personally went to the dump; right?
7 8	A Mm-hmm. Q And what was your job there?	8	A Yes.
9	• 5	9	Q And can you tell me what materials you brought to the dump for those two or three
10	A Equipment operator. Q Same position?	10	trips?
11	A Mm-hmm. Well, basically.	11	A Usually it was dirt, poles and
12	Q And it's the same title, but you	12	transformers.
13	said you operated some other machines?	13	Q Now, I think you said that as an
14	A Well, they yeah, same thing.	14	apprentice lineman a big part of your job was to
15	Only I didn't run the pulling truck as much.	15	kind of clean up after the linemen; is that right?
16	Q And were there any changes in your	16	In other words, you'd go out to a job site where
17	job title between 1978 and your retirement in 2002?	17	they had been earlier, and you'd clean up whatever
18	A Hmm-mm.	18	was
19	Q That's pretty much how you ended	19	A That's when I was with George Lewis.
20	your career then?	20	Q Right. That's what I'm talking
21	A Yeah.	21	about now was that time period with George.
22	Q Okay. So that was the next 24	22	A Okay. Yeah.
23	years; correct?	23	Q You basically cleaned up after the
24	A Yeah. Does that figure up to about	24	linemen?
25	48 years?	25	A Pardon?

Q You'd clean up after the linemen?		Page 89		Page 91
A Yeah.  O Now, you mentioned you brought dirt, and I think you said at one point there might be a wheelbarrow full of dirt?  A Yeah.  O I think at one point you said  sometimes it was good dirt, sometimes it was bad dirt. Were you talking about during that time priord?  A Some of it had oil in it where the process of the during when the during when the sometimes it was bad dirt. Were you talking about during that time priord?  A Some of it had oil in it where the process of the during when those transformers leaked or fell, and it would have oil to the dump sometimes the dirt was just fill dirt?  A Right.  O So in those two to three times you went to the dump sometimes the dirt was just fill dirt?  A Right.  O Do you remember was it one time it probably didn't have nothing - only time we had oil was when we had a bad transformer.  Page 90  C Can't remember.  Sometimes the dirt was just fill dirt?  A Well, if we just took poles the dirt probably didn't have nothing - only time we had oil was when we had a bad transformer.  Page 91  O Let's talk about the transformers then. When you took those to the dump were these transformers that had been damaged?  A Yeah.  Page 90  C So any yes for the court reporter.  A Yes.  O And ohmetimes when they had been brought down by an accident or some kind of violent transformers were those things pretty broken up?  A Right.  O And other times when the were times where where times where the south the transformer at least once, but probably not each trip?  A Yes.  O And other times when the south to the South Dayton Dump were times where the careacted and the oil had leaked out; right?  A Well, if we just took poles the dirt you did read the south at a transformer; sust be poles.  Q Can't remember.  A Well, if we just took poles the dirt was just fill dirt?  A Well, if we just took poles the dirt probably didn't have a transformer, sud didn't have a transformer; sud to the those vertifiers the well was under the probably not each trip?  A Well, if we just took poles the dirt prob	-		-1	
Q Now, you mentioned you brought dirt, and I think you said at one point there might be a wheelbarrow full of dirt? Q I think at one point you said sometimes it was good dirt, sometimes it was bad dirt. Were you talking about during that time period? A Some of it had oil in it where the transformers leaked or fell, and it would have oil and we'd clean it up. A Some of it had oil in it where the transformers leaked or fell, and it would have oil and we'd clean it up. A Right. O Do you remember was it one time it had oil or A Right. O Do you remember was it one time it phad oil or Q Can't remember. C Can't remember. D A Lean't remember. C Can't remember. D C Let's talk about the transformer. D C Let's talk about the transformer.  Fage 90  Q Let's talk about the transformer.  Page 90  Q D D you said sometimes after storms, is that right? A Mehnhmm. Q Say yes for the court reporter. A Yes. Q And other times when they had been brought down by an accident or some kind of violent event; right? A Right. Q Can you tell me when you saw those transformers were those things pretty broken up? A Right. Q So the oil would leak out of those? A Right. Q So the oil would leak out of those? A Right. Q So the oil would leak out of those? A Right. Q Was the easing also cracked or itself: A Right. Q Was the easing also cracked or itself: A Right. Q Was the easing also cracked or itself: A Right. Q Was the easing also cracked or itself: A Right. Q Was the easing also cracked or itself: A Right. Q Was the easing also cracked or itself: A Right. Q So the oil would leak out of those? A Right. Q Was the easing also cracked or itself: A Right. Q Was the easing also cracked or itself: A Right. Q And I think you said that you did remember sometimes seeing those tr		•		
4 A Right. 5 wheelbarrow full of dir? 6 A Yeah. 7 Q I think at one point you said 8 sometimes it was pood dirt, sometimes it was bad dirt. Were you talking about during that time 9 period? 11 A Sometimes it was pood firt, sometimes it was bad dirt. Were you talking about during that time 12 transformers leaked or fell, and it would have oil 13 and we'd clean it up. 14 Q So in those two to three times you 15 went to the dump sometimes the dirt had oil, 16 sometimes it didn't? 17 A Right. 18 Q Do you remember was it one time it 19 had oil or 20 A I can't remember. 21 Q Can't remember. 22 Sometimes the dirt was just fill din? 23 A Well, If we just took poles the dirt 24 probably didn't have nothing only time we had oil was when we had a bad transformer. 25 Sometimes the dirt was just fill din? 26 A Yeah. 27 Q Let's talk about the transformers 28 tensformers that had been damaged? 30 Let's talk about the transformers 4 A Yeah. 4 A Yeah. 5 Q I think you said sometimes after 5 storms; is that right? 5 A Mm-hmm. 6 Q And other times when they had been 10 brought down by an accident or some kind of violent 11 brought down by an accident or some kind of violent 12 event, right? 13 A Right. 14 Q Sa v yes for the court reporter. 15 A Yes. 16 Q And other times when they had been 17 brought down by an accident or some kind of violent 18 Q Say yes for the court reporter. 19 A Right. 10 Q San you tell me when you saw those 11 transformers were those things pretty broken up? 12 A Right. 13 Q What time period, do you recall? 14 Was broke, and that let the oil out. 15 A Right. 16 Q Was the easing also cracked or just 17 Was broke, and that let the oil out. 18 Q So the oil would leak out of those? 19 A Right. 19 A Right. 20 Q Was the casing also cracked or just 21 A Yes. 22 A Yes. 23 Q So both were cracked? 24 A Yes. 25 Q So both were cracked? 26 A The would be deired on the 27 A Yes. 28 Q So both were tracked? 29 A The metal would be deired on the				
sheelbarrow full of dirt?  A Yeah.  7 A Yeah.  8 owhelbarrow full of dirt?  8 A Yeah.  9 I think at one point you said sometimes it was bad dirt. Were you talking about during that time period?  10 period?  11 A Some of it had oil in it where the transformers leaked or fell, and it would have oil and we'd clean it up.  12 transformers leaked or fell, and it would have oil and we'd clean it up.  13 and we'd clean it up.  14 Q So in those two to three times you went to the dump sometimes the dirt had oil, sometimes it didn't a went to the dump sometimes the dirt had oil, sometimes it didn't remember.  15 went to the dump sometimes the dirt had oil, sometimes it didn't remember.  16 A Right.  17 A Right.  18 Q Do you remember was it one time it had oil or  21 Q Can't remember.  22 Sometimes the dirt was just fill dirt?  23 A Well, if we just took poles the dirt probably didn't have nothing only time we had oil was when we had a bad transformer.  19 Q Let's talk about the transformers then. When you took those to the dump were these transformers that had been damaged?  4 A Yeah.  9 Q Let's talk about the transformers then. When you took those to the dump were these transformers that had been damaged?  10 Q Let's talk about the transformers then. When you took those to the dump were these transformers that had been damaged?  10 Q Let's talk about the transformers then. When you took those to the dump were these transformers that had been damaged?  11 Deal of the two or three trips you took to the South Dayton Dump at transformer on each one of those trips, or were there trips where you didn't have a transformer, just be poles.  Q Now, did you bring a transformer on each one of those trips, or were there trips where you didn't have a transformer; just be poles.  Q Sometimes the dirt was just fill dirt?  22 A Well, if we just took poles the dirt you remember taking throughout that six-month time period with George Lewis, you had at a transformer at least once, but probably not cach trip?  A Yeah.  Q Let's talk a				, , , , , , , , , , , , , , , , , , ,
A Yeah.  O I think at one point you said sometimes it was good dirt, sometimes it was good dirt, sometimes it was book of period?  A Some of it had oil in it where the 12 transformers leaked or fell, and it would have oil 14 and we'd clean it up.  O So in those two to three times you wit to the dump sometimes the dirt had oil, 25 sometimes it didn't?  A Right.  O Do you remember was it one time it 18 had oil or 22 sometimes the dirt was just fill dirt?  A Right.  O Do you remember was it one time it 19 had oil or 22 sometimes the dirt was just fill dirt?  A Well, if we just took poles the dirt 23 probably didn't have nothing - only time we had 25 oil was when we had a bad transformer:  Page 90  Q Let's talk about the transformers that had been damaged?  A Yeah.  O Say yes for the court reporter.  A Right.  O Do you remember was it one time it 19 had oil or 22 sometimes the dirt was just fill dirt?  A Well, if we just took poles the dirt 24 probably didn't have nothing - only time we had 25 oil was when we had a bad transformer:  Page 90  Q Let's talk about the transformers that had been damaged?  A Yeah.  O Say yes for the court reporter.  A Right.  O What time period with George Lewis, you had a transformer at least once, but probably not each trip?  A Notal three times, you didn't have a transformer, is the transformer; and the cord transformer at least once, but probably not each trip?  A Not all three times, or were thee trips where you with George Lewis, you had a transformer at least once, but probably not cach trip?  A Not all three times, or were the trips where you with George Lewis, you had a transformer at least once, but probably not cach trip?  A Not all three times, or once, I don't know.  O D Core or twice?  A Right.  O But the two or three trips you took the Sight.  A Right.  O But the two or three trips where one of those trips, or were there trips where you didn't have a transformer.  Page 90  A Weal three treaked and the oil had leaked out; right?  A Well, if we just the didn't yell didn't ha				<u> </u>
A Some of it had oil in it where the transformers leaked or fell, and it would have oil and and we'd clean it up.  A Some of it had oil in it where the transformers leaked or fell, and it would have oil and and we'd clean it up.  A Right.  C Do you remember was it one time it had oil or  A Right.  A Lean't remember.  A Veal.  Expany 90  A Well, if we just took poles the dirt probably didn't have nothing only time we had oil was when we had a bad transformer.  Page 90  A Veal.  A Yeal.  A Yeal.  A Yeal.  A Yeal.  A Right.  A Yeal.  A Yeal.  A Yeal.  A Yeal.  A Yeal.  A Right.  A Not all three times when they had been brought down by an accident or some kind of violent tent; right?  A Right.  A Right.  A Right.  A Yeal.  A Yeal.  A Yeal.  A Yeal.  A Yeal.  A Right.  A Not all three times when they had been brought down by an accident or some kind of violent tent; right?  A Right.  A Right.  A Right.  A Yeal.  A Yeal.  A Yeal.  A Yeal.  A Right.  A Not all three times when they had been brought down by an accident or some kind of violent tent; right?  A Right.  A Right.  A Right.  A Yeal.  A Yeal.  A Yeal.  A Yeal.  A Right.  A Yeal.  A Yeal.  A Yeal.  A Yeal.  A Yeal.  A Right.  A Yeal.  A Yeal.  A Yeal.  A Yeal.  A Yeal.  A Right.  A Not all three times where there trips where tende on the othere trips where vouldin't have a transformer; just be poles.  A Yeal.  A Right.  A Not all three times where there trips where was didn't take a transformer taking throughout that six-month time elast once, but probably not each trip?  A Not all three times. When the what the transformer at least once, but probably not each trip?  A Right.  Q Now, remember Miss Wolfe asked				
sometimes it was good dirt, sometimes it was bad dirt. Were you talking about during that time period?  A Some of it had oil in it where the transformers leaked or fell, and it would have oil and we'd clean it up.  O So in those two to three times you went to the dump sometimes the dirt had oil, sometimes it didn't?  A Right.  A Right.  O Do you remember was it one time it had oil or  O Can't remember.  D Q Let's talk about the transformers.  Page 90  1 Q Let's talk about the transformers.  Page 90  1 Q Let's talk about the transformers.  Page 90  1 Q Let's talk about the transformers.  Page 90  1 Q Let's talk about the transformers.  Page 90  1 Q Let's talk about the transformers.  Page 90  1 A Yeah.  Page 90  1 A Yeah.  Page 90  1 A Yeah.  Page 90  1 A Mm-hmm.  A Yeah.  A Mm-hmm.  A Yeah.  A Yeah.  A Mm-hmm.  A Yeah.  A Right.  O Now, did you bring a transformer on each one of those trips, or were there trips where you didn't have a transformer?  A Oh, there was probably trips that we didn't take a transformer?  A Ob the South Daylon Dump were times transformer and leaked out; right?  A Right.  A Right.  A Oh, there was probably trips that we didn't take a transformer?  A Oh, there was probably trips that we didn't take a transformer?  A Oh the two or three trips you took hose to the demy series are transformer?  A Oh, there was probably trips that we didn't take a transformer?  A Not all three times. Probably not each trip?  A Not all three times. Probably not.  Maybe twice or once. I don't know.  Q Once or twice?  A Yeah.  Page 92  A Yeah.  Page 92  A Wall time kere and other times that you actually saw a DP&L truck going into the South Daylon Dump?  A Right.  Q Now, cremember Miss Wolfe asked you some questions about were there any other times that you actually saw a DP&L truck going into the South Daylon Dump?  A Right.  Q What time period was that, do you recember was that fine the ciloud.  A Right.  Q Was the casing also cracked or just  A Right.  Q And how was it that you happened to see the service				
dirt. Were you talking about during that time period?  A Some of it had oil in it where the transformers leaked or fell, and it would have oil and we'd clean it up.  Q So in those two to three times you went to the dump sometimes the dirt had oil, sometimes it didnt?  A Right.  Q Do you remember was it one time it had oil or  Q Can't remember. But not every time.  Sometimes the dirt was just fill dirt?  A Well, if we just took poles the dirt probably didn't have nothing only time we had oil was when we had a bad transformer.  D C Let's talk about the transformers then. When you took those to the dump were these transformers that had been damaged?  A Yeah.  Q Day our remember. But not every time.  Page 90  Let's talk about the transformers then. When you took those to the dump were these transformers that had been damaged?  A Yeah.  Page 90  Let's talk about the transformers then. When you took those to the dump were these transformers that had been damaged?  A Yeah.  A Yeah.  A Yeah.  Page 92  A Right.  Q Do your remember at king throughout that six-month time brough with George Lewis, you had a transformer at least once, but probably not each trip?  A Not all three times. Probably not.  Maybe twice or once. I don't know.  Q Once or twice?  A Right.  Q Now, remember Miss Wolfe asked you some questions about were there any other times that you actually saw a DP&L truck going into the South Dayton Dump?  A Right.  Q Can you tell me when you saw those transformers were those things pretty broken up?  A Right.  Q Can you tell me when you saw those transformers were those things pretty broken up?  A Right.  Q Can you tell me when you saw those transformers were those things pretty broken up?  A Right.  Q What time period, do you recall?  Was this sometimes the dock, and they  A Idon't remember.  A Idon't remember.  A Idon't remember.  A Idon't remember cannot the carbon to the court reporter.  A Right.  Q What time period, do you recall?  A Pardon?  A Pardon?  A Pardon?  A Pardon?  A Pardon?  A Pardon the memb	8			
transformers had been cracked and the oil had leaked out; right?  A Some of it had oil in it where the transformers leaked or fell, and it would have oil and we'd clean it up.  Q So in those two to three times you went to the dump sometimes the dirt had oil, sometimes it didn't?  A Right.  Q Do you remember was it one time it had oil or  A Right.  C Can't remember.  C Can't remember But not every time.  Sometimes the dirt was just fill dirt?  A Well, if we just took poles the dirt probably didn't have nothing only time we had oil was when we had a bad transformer.  Page 90  Let's talk about the transformers  Then. When you took those to the dump were these transformers that had been damaged?  A Yeah.  Page 92  Let's talk about the transformers  A Not all three times. Probably not.  Maybe twice or once. I don't know.  Q Once or twice?  A Yeah.  Page 92  A Yeah.  Page 92  A Right.  Q But you're not quite sure at this point?  A Right.  Q Now, tidd you bring a transformer on each one of those trips, or were there trips where you didn't have a transformer?  A O, there was probably trips that we didn't take a transformer; just be poles.  Q So in those two to three trips hat we didn't take a transformer; just be poles.  Q So in those two to three trips that we didn't take a transformer?  A Not all three times. Probably not.  Maybe twice or once. I don't know.  Q Once or twice?  A Yeah.  Page 92  A Right.  Q Now, tide you bring a transformer on each one of those trips hat we didn't take a transformer?  A Not all three times. Probably not.  Maybe twice or once. I don't know.  Q Once or twice?  A Right.  Q Now, temember Miss Wolfe asked you some questions about were there any other times that you actually saw a DP&L truck going into the South Dayton Dump?  A Right.  Q What time period was that, do you recall?  Was this sometime during the sixties or during the seventies or  Rall don't remember.  A Right.  Q What time period, do you recall?  Was this sometime during the sixties or during the seventies or  A I	9		9	
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sometimes it didn't? A Right. O Do you remember was it one time it had oil or C C C and other times when they had been brought down by an accident or some kind of violent transformers were those things pretty broken up? A Yes. O Can Yes. A Right. C So in those two to three trips that we didn't take a transformer, uste be poles. O Do you remember was it one time it didn't take a transformer, uste be poles. O Do you remember. D So in those two to three trips that you remember taking throughout that six-month time period with George Lewis, you had a transformer at least once, but probably not each trip? A Not all three times. Probably not. Maybe twice or once. I don't know. O Once or twice? A Yeah. O Do with George Lewis, you had a transformer at least once, but probably not each trip? A Not all three times. Probably not. Maybe twice or once. I don't know. O Once or twice? A Yeah. O Do with George Lewis, you had a transformer at least once, but probably not each trip? A Not all three times. Probably not. Maybe twice or once. I don't know. O Once or twice? A Yeah. O Now, remember Miss Wolfe asked you some questions about were there any other times when you saw and that poun took in this you actually saw a DP&L truck going into the South Dayton Dump? A Mm-hnm. O Say yes for the court reporter. A Right. O Can you tell me when you saw those transformers were those things pretty broken up? A Right. O So the oil would leak out of those? A Right. O So the oil would leak out of those? A Right. O So the oil would leak out of those? A Right. O So both were cracked? A Yes. A Not all three times. Probably not. Maybe twice or once. I don't know. O Once or twice? A Yeah. O Now, remember Miss Wolfe asked you some questions about were there any other times that you actually saw a DP&L truck going into the South Dayton Dump? A Mm-hnm. A Right. O A Right. O What time period, do you recall? Was this sometime during the sixties or during the seventies or				
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18				
19				
A I can't remember. But not every time. Can't least once, but probably not cach trip? A Notall three times. Probably not. Can't remember. Probably not. Can't remember. Probably not cach trip? A Notall three times. Probably not cach trip? A Yeah. Can't end with George Lewis, you had a transformer at least once, but probably not cach trip? A Notall three times. Probably not cach trip? A Yeah.  Can't end with George Lewis, you had a transformer at least once, but probably not cach trip? A Yeah.  Can't end use sure at this Can't end. Can't end use sure at this Can't end use sure at this Can't end. Can't end use sure at this Can't end. Can't end use sure at this Can't end.				
Q Can't remember. But not every time. Sometimes the dirt was just fill dirt? A Well, if we just took poles the dirt probably didn't have nothing only time we had oil was when we had a bad transformer.  Page 90  Q Let's talk about the transformers then. When you took those to the dump were these transformers that had been damaged?  I A Yeah. Q I think you said sometimes after storms; is that right? A Mm-hmm. Q Say yes for the court reporter. Q And other times when they had been brought down by an accident or some kind of violent event; right? A Right. Q Can you tell me when you saw those transformers were those things pretty broken up? A They were usually the porcelain was broke, and that let the oil out. Q Os both were cracked? A Yes. Q So both were cracked? A Yes. Q And how was it that you happened to see these trucks goin to the doump? A The metal would be dented on the				
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1 Q Let's talk about the transformers 2 then. When you took those to the dump were these 3 transformers that had been damaged? 4 A Yeah. 5 Q I think you said sometimes after 6 storms; is that right? 7 A Mm-hmm. 8 Q Say yes for the court reporter. 9 A Yes. 10 Q And other times when they had been 11 brought down by an accident or some kind of violent 12 event; right? 13 A Right. 14 Q Now, remember Miss Wolfe asked you some questions about were there any other times that you actually saw a DP&L truck going into the South Dayton Dump? 8 A Mm-hmm. 9 Q And I think you said that you did remember sometimes seeing those trucks go in; right? 10 A Right. 11 Q But you're not quite sure at this point?  A Right. Q Now, remember Miss Wolfe asked you some questions about were there any other times that you actually saw a DP&L truck going into the South Dayton Dump?  8 A Mm-hmm. 9 Q And I think you said that you did remember sometimes seeing those trucks go in; right? 12 A Right. 13 Q What time period was that, do you recall? 14 To Was this sometime during the sixties or during the seventies or 19 A Right. 19 A Right. 10 Q Was the casing also cracked or just 20 Q Was the casing also cracked or just 21 22 A Yes. 23 Q So both were cracked? 24 A The metal would be dented on the 25 Dount? 26 A Right. 27 Q And other times when they had been there any other times that you actually saw a DP&L truck going into the South Dayton Dump? 28 A Mm-hmm. 29 A Mm-hmm. 20 Q And I think you said that you did remember sometimes seeing those trucks go in; right? 21 A Pardon? 22 A Ves. 23 Q So the oil would leak out of those? 24 A The metal would be dented on the 24 A I'd be out on the dock, and they			***************************************	
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1	Q So you'd be go ahead.	1	A Right.
2	A Dump the transformer, and then	2	Q And you said that I think you
3	they'd go over to the building and back into the	3	said that there were transformers on those trucks?
4	dock.	4	A Mm-hmm.
5	Q So when you say you're on the dock,	5	Q How did you know that?
6	you're standing on the loading dock at the Service	6	A You could see it on they'd tie
7	Center; right?	7	'em right on the back of the truck.
8	A Right.	8	Q They'd tie 'em on the back of the
9	Q And you're looking out I think to	9	truck. And what kind of trucks were these?
10	the west?	10	A Line trucks.
11	A Towards the bridge.	11	Q Line trucks. So can you describe a
12	Q Towards the bridge you're saying?	12	line truck for me?
13	A Yeah. That's where I think it came	13	A Well, they're usually just like a
14	from the way I looked at it. I don't know.	14	regular truck, and they have sides on 'em up so
15	Q So you're looking to the west.	15	high, and then the top.
16	You're on the dock, and you're on one side of the	16	Q So you said "sides." These are
17	street. And where was the dock on the Service	17	trucks that had big panels on the side; right?
18	Center? What part of the property? Was that the	18	A Right.
19	northern part or some other	19	Q And so there was a door on the
20	A Faced Broadway.	20	outside you can open and access tools and stuff?
21 22	Q Faced Broadway. Was it on the	21 22	Is that how it worked?
23	northern part of the property or southern part of the property, do you remember?	23	A Usually it was a curtain, and it
24	A It was on the south side.	24	usually never got closed. It was always open.  Q Okay. So when you said that there
25	Q So you're on the southern piece of	25	was sides
	Page 94		Page 96
		_	-
1	the property. You're looking to the west. You're	1	A Yeah.
2	looking at the cross street, and you said that you	2	Q that were so high
3	saw trucks pulling into the dump; right?	3	A Yeah.
4 5	A Yeah.	4 5	Q how high were they? A They had a roof on it that you could
6	Q Now, they pulled into an entrance on the north side of the dump, right, up towards the	6	A They had a roof on it that you could slide back.
7	bridge?	7	Q And how high were the sides?
8	A Yeah.	8	A Oh, probably four foot or six foot
9	Q So you're on the south side of the	9	maybe.
10	property looking north up the street at the trucks;	10	Q What were they made of? That was
11	right?	11	just the sheet metal on the side of the truck?
12	A Yeah.	12	A Right. Just sheet metal, yeah.
13	Q And so you could see them drive in;	13	Q And then you said there was a roof
14	correct?	14	that you could slide back and forth?
15	A Mm-hmm.	15	A Mm-hmm.
16	Q And about how far was that, the	16	Q Was that canvas?
17	distance? We could go measure it, and maybe we	17	A Well, it wasn't a canvas. It was a
18	will, but	18	steel roof you slid back and forth, and then the
19	A Probably from here to that building	19	canvas would come down if you wanted it to in the
20	over there.	20	back.
21	Q Five hundred yards or so?	21	Q The canvas was in the back?
22	A Yeah.	22	A Yeah, but we never used it because
23	Q So you're about 500 yards away, and	23	we always backed into the dock.
24	you're looking at trucks turning into the South	24	Q So you had four to six feet of sheet
25	Dayton Dump?	25	metal on the side?

		<u> </u>	
	Page 97		Page 99
1	A Right.	1	dump it, but I seen it on there. When he come into
2	Q You had a	2	the building he didn't have it.
3	A Top.	3	Q And that was my next question. You
4	Q top that was made out of sheet	4	didn't actually see him come out of the dump
5	metal also, whatever you call it?	5	either. You just saw him drive into the parking
6	A Mm-hmm.	6	lot of the building or pull up to the dock?
7	Q Then you had a canvas drop in the	7	A I don't remember seeing him come out
8	back that you could open or close?	8	of there. He backed up to the dock next time I
9	A Right.	9	seen him, but I wasn't watching him all the time.
10 11	Q And so you're looking at the up the street?	10 11	Q And I think you said that you
12	A Mm-hmm.	12	believe that they had put the transformer in the
13		13	dump; right? A Mm-hmm.
14	Q And you see trucks coming across the bridge and turning into the dump?	14	Q Now, did you know what condition the
15	A Mm-hmm.	15	transformer was in?
16	Q But you could see transformers on	16	A No. I didn't ask him.
17	those trucks?	17	Q And you couldn't see from where you
18	A Yeah.	18	were, right, what condition it was in?
19	Q Now, how could you see the	19	A No. But I imagine it wasn't good.
20	transformers?	20	Q Well
21	A There was a pole right at the base	21	A I mean, I don't know.
22	of the truck, and they usually always took and	22	Q You'd be guessing it wasn't good;
23	tied the transformer off to that pole on that	23	right?
24	truck.	24	A Huh?
25	Q So just so I understand, was the	25	Q You'd guess that it's not good
	Page 98		Page 100
1	transformer still attached to the pole or was it	1	because
2	A Just like this. There'd be a pole	2	A Right.
3	right here. This is the truck bed. And they'd set	3	Q you assume they put it in the
4	the transformer right here. And then when they	4	dump; right?
5	pulled in the gate they went that way, and you	5	A Right.
6	could see the transformer there.	6	Q I think you said that you saw oil in
7	Q So was the transformer actually	7	the bed of the truck?
8	sitting sort of sitting on a pole like almost	8	A Yes.
9	like a hook or something?	9	Q Now, we're talking about I'm
10	A It was sitting right on the bed of	10	trying to figure out what the time period is here.
11	the truck.	11	This is sometime while you're working in Dayton at
12	Q Right on the bed.	12	the South Broadway facility; right?
13	A Yeah, but it was tied off to that.	13	A Yeah.
14	It had a little winch on 'em. You could winch 'em.	14	Q So it's sometime between 1965 and
15 16	Q And so you're saying that you could	15 16	1975; right?
16 17	see a transformer on the back of that truck A Yeah.	17	A Mm-hmm. O These would be times Louiss, when
18		18	Q These would be times, I guess, when
19	Q and you could see it drive into the dump and see it come out of the dump?	19	you weren't actually out working. For some reason you're back at the plant; right?
20	A Well, I seen him go into the dump	20	A Mm-hmm. We might have got done on
21	with it, and I seen him when he came over to the	21	the job, you know, half an hour, an hour early. So
22	building.	22	we'd go back and clean the truck off and stuff.
23	Q So you saw the truck go into the	23	Q This might happen at the very end of
24	dump; right?	24	the day or something like that?
25	A Yeah. I didn't actually see him	25	A Right.
	11 1 Tours 1 didn't workering DVV IIIIII		* * * * * * * * * * * * * * * * * * *

	Page 101		Page 103
1	Q Do you remember about how often you	1	A Bridge.
2	saw something like this happen?	2	Q the bridge when you saw a DP&L
3	A Not very often.	3	truck come in and then turn into the South Dayton
4	Q It's not very often at all?	4	Dump, and you said that you believed that you saw a
5	A No.	5	transformer on the bed.
6	Q Five times in the course of the ten	6	A Mm-hmm.
7	years?	7	Q And that when the truck came up to
8	A I never saw it that many times	8	the dock later it wasn't there; right?
9	probably.	9	A Right.
10	Q Even fewer than that?	10	Q And I think what you said that it
11	A Huh?	11	was your assumption that they must have disposed of
12	Q Even fewer than that?	12	that transformer at the dump; right?
13	A Yeah.	13	A Right.
14	Q Maybe two times?	14	Q I guess my question is, are you sure
15	A Probably two or three times maybe.	15	that's what happened as opposed to that transformer
16	Q Two to three times over ten years?	16	being dropped off at the transformer shop?
17	A Mm-hmm.	17	A No, it didn't there ain't no
18	Q Now, you said that you saw oil in	18	transformer shop over there.
19	the bed of the truck, and that was another reason	19	Q Well, there's one at the Service
20	why you assumed that they had brought a transformer		Center; right?
21 22	to the dump; right?	21	A The one in back of where I was
23	A Yeah.	22 23	standing, but he didn't he came in came out
24	Q Now, did you know whether there was any PCBs in the oil?	23 24	of there, went down and came in the south gate, pulled up and backed right into his spot.
25	A At that time I didn't. Well, they	25	Q Well, when I asked you earlier you
20		2.5	
	Page 102		Page 104
1	didn't worry about that stuff.	1	said that you didn't actually see them pull in.
2	Q Well, my question is different,	2	You just saw them at the dock. You didn't see them
3	though. Did you know that there were PCBs in the	3	leave the dump. You saw the truck at the dock.
4	oil?	4	You said there was no transformer there, and there
5	A No, I didn't know it.	5	was oil in the bed and you assume
6	Q And, in fact, you don't know whether	6	A That was after they came across the
7	there's PCBs in the oil in the transformers that	7	bridge and went back into the dump. Then they came
8	you moved; right?	8	out of the dump and went down came in the South
9	A No.	9	Yard, come up and backed into the dock.
10	Q I think you said that there were	10	Q Just so I'm clear, did you see them
11	times when you put your arms into these	11	come out of the dump? A moment ago when I asked
12	transformers all the way up to your elbows to work	12	you you said
13	some of these keys, and you washed it off with cold	13	A No, I did not see 'em come out of
14	water and you never had any problems; right?	14	the dump, but I seen 'em come up and back the truck
15	A Right.	15	in.
16	Q So sitting here today, you don't	16 17	Q Well, my question is, you said you
17	know one way or another whether any of the oil	17	saw them backing the truck to the dock at the
18	we're talking about today had PCBs in it; correct?	18	Service Center; right?
19	A No. I can't guarantee it.	19	A Right.
20	MR. CAMPBELL: Let's have five minutes.	20	Q How do you know that they hadn't
21 22	(Whereupon, a recess was taken.)	21	dropped the transformer at the transformer shop
23	Q Mr. Wall, I just have a couple of	22 23	before they pulled back at the dock you were
23 24	last questions. We were talking about those couple		standing at? Do you know whether they did or didn't?
24 25	of times when you were looking north up towards the	24 25	
۷)		∠3	A I seen 'em when they came in the

	Page 105		Page 107
1	gate down at the bottom the south gate I seen	1	there.
2	'em come in there. So they the only other place	2	Q So you never saw any transformers
3	they could have dumped it would have been in the	3	over there?
4	South Yard, and they wouldn't have dumped it over	4	A No.
5	there.	5	Q So a minute ago you thought maybe
6	Q So just so I'm tracking with you,	6	they had some for substations, but
7	you're saying you actually saw the truck enter the	7	A Well, yeah, substation stuff. I
8	DP&L parking lot; correct?	8	don't know whether it's they have oil switches,
9	A Right.	9	which is, you know, similar to a transformer, but
10	Q So you didn't see it leave the dump.	10	they look they look about like a transformer,
11	You saw it come into the parking lot; right?	11	but I ain't that I wasn't into it that much.
12	A Right. And I saw it going into the	12	Q Now, you said that during that
13	dump.	13	six-month period Mr. Lewis once or twice you
14	Q I got that part.	14	thought may have taken a transformer to the South
15	A Okay.	15	Dayton Dump in the truck you drove in; right?
16	Q I'm talking about how is it that you	16	A The truck that I was on with him.
17	know standing on the dock at DP&L that that	17	Q How was that do you remember how
18	transformer wound up in the South Dayton Dump as	18	that transformer or transformers were actually
19	opposed to, you know, for example, the transformer	19	moved from the truck into the dump site? Do you
20	shop at the Service Center? See, we talked earlier	20	know how they got it off the truck?
21	about how a lot of transformers came there and	21	A Yeah, I know how he got 'em off.
22	people would decide whether they could be	22	Q How did he get 'em off?
23	reconditioned or not, and a lot of them were	23	A Hooked a winch to the cable on the
24	reconditioned. Do you remember that?	24	trailer and the winch brought it up and we dumped
25	A Yeah.	25	'em and we drove away.
	Page 106		Page 108
1	Q So how do you know it didn't wind up	1	Q I think you said in your deposition
2	over there as opposed to in the South Dayton Dump?	2	that well, that you mostly dealt with much
3	A Because he never drove around there.	3	smaller transformers.
4	Q So you're saying that you saw them	4	A They are.
5	enter the parking lot and go directly from the	5	Q I think you said like 10s
6	parking lot to the dump?	6	A We'd get rid of the poles,
7	A To the dump.	7	transformers and dirt when we'd dump it.
8	Q And you didn't think they could	8	Q I'm glad you mentioned that. So
9	leave it at the South Yard; correct?	9	when you brought the winch, was it just the
10	A No.	10	transformer or is it still attached to the pole?
11	Q And why is that?	11	A Broken pole, yeah.
12	A Because they never left transformers	12	Q So it was still attached to the
13	at the South Yard.	13	pole?
14 15	Q You never saw a transformer there?	14	A Yeah, some of 'em.
15 16	A No, not a damaged one or anything.	15 16	Q 'Cause a minute ago you said that
17	Q Did you ever see a new one over there?	16 17	you remember only once or twice having a
18		18	transformer that you actually saw A Right.
19	A Not unless it was a great big one for substations.	19	
20	Q They did keep some transformers over	20	Q go into that dump site on a truck you were on.
21	there?	21	A Right.
22	A Huh?	22	Q So your memory is that they were
23	Q So they did keep some there	23	attached to a pole, or at least one time was
24	periodically you're saying?	24	attached to a pole?
25	A I don't remember of any being over	25	A Yeah. I mean, they was attached to
	11 1 don't lemember of any being over		11 1 can, 1 mean, mey was attuened to

	Page 109		Page 111
1	a pole. Sometimes we would take 'em off just to	1	I, CLARENCE WALL, do hereby certify that
2	make it easier to load to load the transformer	2	the foregoing is a true and accurate transcript of
3	separate and it separate, but it didn't matter	3	my testimony.
4	whether it set up or laid down to us. It was junk.	4	
5	We just loaded everything on the trailer and took	5	2020
6	it over and dumped it.	6	
7	Q Now, was it actually in the bed of	7	
8	your truck or on a trailer?	8	CLARENCE WALL
9	A It was on a trailer.	9	
10	Q On a trailer. Okay. After you	10	STATE OF OHIO )
11	well, strike that.	11	) SS:
12	MR. CAMPBELL: I don't think I have	12	COUNTY OF
13	anything else. Thanks for your time.	13	Sworn to before me and subscribed in my
14	THE WITNESS: You're welcome.	14	presence by the same CLARENCE WALL, this day
15	MR. CAMPBELL: Anybody on the phone have	15	of, 2012.
16	any questions?	16	
17	MR. HARBECK: Still not here. This is	17	
18	Bill Harbeck.	18	
19	MR. ERZEN: Mark Erzen, no questions.	19	NOTARY PUBLIC
20	MR. LEWIS: Marty Lewis, no questions.	20	My Commission expires:
21	MS. WRIGHT: Vicki Wright, no questions.	21	
22	MS. WOLFE: And I don't have any further	22	
23	questions for you either.	23	10 A C C C C C C C C C C C C C C C C C C
24	MR. MOSS: No questions.	24	0,000
25	MS. WOLFE: That means you're done.	25	
	Page 110		Page 112
1	Mr. Wall, you can have the transcript of	1	PLEASE USE THIS ERRATA SHEET TO MAKE ANY
2	your testimony sent to you, and that would give you	2	AND ALL CORRECTIONS BY LISTING THE PAGE NUMBER,
3	an opportunity to read it and make sure that the	3	LINE NUMBER AND THEN A BRIEF DESCRIPTION OF THE
4	court reporter took down everything you said	4	ERROR. PLEASE DO NOT MAKE ANY MARKS OR CORRECTIONS
5	accurately. And you can indicate anything that was	5	ON THE TRANSCRIPT. IF NEEDED, USE THE BACK OF THIS
6	not taken down accurately and then return it back	6	SHEET.
7	to the court reporter, so that way you're reviewing	7	UPON COMPLETION, PLEASE SIGN AND DATE THIS
8	it before it becomes final. Would you like to do	8	SHEET AT THE BOTTOM. THANK YOU.
9	that?	9	99997
10	THE WITNESS: I don't know.	10	
11	MS. WOLFE: I think that you don't have	11 12	
12	to decide now. You can have it sent to you, and	13	
13 14	then if you decide you don't want to look at it,	13	
15	just send it back to her. How about that? Would that work?	15	
16	THE WITNESS: Yeah.	16	
17		17	
18	(The taking of the deposition concluded	18	
19	at 3:45 o'clock p.m.)	19	
20		20	
21		21	
22		22	
23		23	
24		24	
25		25	SIGNATURE:DATE:

28 (Pages 109 to 112)